

Before the
Federal Communications Commission
Washington D.C. 20554

In the matter of)	
)	
2002 Biennial Regulatory Review – Review of)	MB Docket No. 02-277
the Commission’s Broadcast Ownership Rules and)	
Other Rules Adopted Pursuant to Section 202 of)	
the Telecommunications Act of 1996)	
)	
Cross-Ownership of Broadcast Stations and)	MM Docket No. 01-235
Newspapers)	
)	
Rules and Policies Concerning Multiple Ownership)	MM Docket No. 01-317
of Radio Broadcast Stations in Local Markets)	
)	
Definition of Radio Markets)	MM Docket No. 00-244

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January 2, 2003

LIST OF ATTACHMENTS

- | | |
|--------------|--|
| Attachment 1 | Marius Schwartz & Daniel R. Vincent, <i>The Television National Ownership Cap and Localism</i> (2003) |
| Attachment 2 | NAB/NASA Joint Survey of Broadcast Stations Affiliated with ABC, CBS, and NBC |
| Attachment 3 | NAB/NASA Request for Collection of Data By FCC and FCC Order Denying Request |
| Attachment 4 | Letter from Senators Fritz Hollings (D-S.C.), Trent Lott (R-Miss.), Daniel Inouye (D-Haw.), Ted Stevens (R-Alaska), Byron Dorgan (D-N.D.), Max Cleland (D-Ga.), John Edwards (D-N.C.), Conrad Burns (R-Mont.), Jesse Helms (R-N.C.), and Barbara Boxer (D-Cal.), and Representatives John Dingell (D-Mich.), Richard Burr (R-N.C.), Edward Markey (D-Mass.), and Chip Pickering (R-Miss.) to Michael Powell, Chairman, Federal Communications Commission (June 29, 2001) |
| Attachment 5 | Letter from Ken Sieve, District Director, Muscular Dystrophy Association, to Representative Ike Skelton (D-Mo.) (Aug. 15, 2000) |
| Attachment 6 | Letter from Jerry Lewis to Michael Powell, Chairman, Federal Communications Commission (Jan. 29, 2001) |
| Attachment 7 | Television Stations Owned by Companies Associated with the Big Four Networks |
| Attachment 8 | Early Submission of NAB and NASA |

ATTACHMENT 1

The Television National Ownership Cap and Localism

by

Marius Schwartz and Daniel R. Vincent

January 2, 2003

Table of Contents

Executive Summary	1
I. Introduction	2
II. Networks and Stations: Their Economic Functions and Incentives	5
A. Economic Functions	5
B. Common Interests But Also Conflicting Incentives: Networks' Stronger Interest in Uniformity	7
III. Likely Effects of the Cap	8
A. The Cap Has No Obvious Impact on Affiliates' Profits	9
B. The Cap Can Be Expected to Affect Viewers	11
C. The Cap Can Advance Viewpoint Diversity	12
IV. Despite Increased Video Alternatives, the Broadcast Networks Remain Significant	13
V. Conclusion	16
References	18
Appendix: A Model of Network and Affiliate Bargaining With and Without the Cap	20

Executive Summary

The major TV broadcast networks distribute their programming in some local markets through stations they own and elsewhere through non-owned affiliates. The FCC's national ownership cap (the "Cap") prevents networks (or other entities) from owning stations in markets that collectively account for more than 35% of TV households. The FCC's Right-to-Reject Rule (the "Rule") constrains the type of financial inducements and other arrangements a network may use to influence the programming decisions of its affiliated stations.

The Cap and the Rule can be seen as complementary policies for promoting localism in broadcasting. We interpret the localism goal as a desire to target broadcasters' efforts to serving the interests of relatively small geographic communities. The Cap contributes to localism by ensuring that, in many markets, networks cannot acquire the rights to control programming choices through owning local stations, while the Rule constrains networks from controlling stations' programming through contracts.

Constraining the control networks may exert is relevant because choices made by independent affiliates typically will be more closely attuned to the interests of local viewers and advertisers. A network is an aggregator: it provides a national programming schedule aimed at a representative "national viewer" and its income from national advertisers depends on synchronized airing of its schedule in numerous markets. An affiliate is a local distributor, driven by the interests of the community in its license area. While affiliates have a clear interest in airing much of their network's schedule, they may sometimes wish to depart from it to better address local preferences.

The Cap, in conjunction with the Rule, limits networks from bringing about greater uniformity in programming across markets. By constraining the contracting options of networks and stations, this policy is likely to sacrifice profits and may reduce network investments in programming. Any such costs would have to be weighed against the benefits of localism that result from increased stations' flexibility in programming.

While network-affiliate disputes over the Cap are sometimes portrayed as "just a fight about money," economic analysis contradicts this portrayal for two reasons. First, as noted above, the Cap alters the choices of stations and, hence, the programming viewed by local communities. Second, the Cap confers no obvious power to a typical affiliate in negotiations with its network, and therefore appears to have no systematic effect on boosting affiliate profits. Indeed, it may well reduce the profit the affiliate could collect through selling the station to the network (or through unconstrained contracting).

A major change in the past decade has been the growth of competing video alternatives, notably cable networks. The evidence suggests, however, that broadcast television networks continue to be a significant force in the video marketplace, and are likely to remain so for some time. Thus, if localism remains a policy goal of the FCC, the limit on station acquisition by networks remains an important instrument for pursuing it.

I. Introduction

The FCC's national television ownership cap (the "Cap") bars any entity from owning stations that collectively would reach more than 35% of U.S. television households.¹ The Cap and other regulatory policies in broadcasting have historically pursued at least three goals besides economic efficiency – competition, diversity, and localism.² This paper focuses on the role of the Cap in advancing localism. While the Cap applies both to networks and to other station-group owners, we shall explain that for purposes of analyzing the effects on localism what matters is the limitation of station ownership by networks.

The precise meaning of localism in broadcasting is unsettled.³ One view is that localism refers only to the airing of content that is of local origin (e.g., local news or local public affairs). Such an interpretation, however, seems overly narrow. Serving the interests of a particular community requires not only the airing of some local content, but depends on additional decisions by the broadcast licensee, for example, the amount and timing of commercials made available for local advertisers, and the mix of national programming (network and syndicated) and local programming that appeals to local tastes.

We interpret localism in broadcasting as the use of licensing terms to orient broadcasters' efforts towards small geographic units.⁴ One step in this regard has been to award licenses that are geographically relatively limited, even if this meant sacrificing some economic efficiency.⁵ A second step has been to require that programming decisions be made by the licensee and to attempt to ensure that the licensee's interests are closely aligned with those of the community in the local market covered by the license.

Concern with a licensee's incentives is evidenced in the FCC's Right to Reject Rule (the "Rule") that governs the relations between broadcast networks and their affiliated stations – i.e., the licensees in their respective local markets.⁶ The Rule seeks to maintain a degree of affiliate independence in determining which network programs it will air, by

¹ Specifically, the geographic regions (TV Designated Market Areas, or DMAs) in which an entity owns stations can account for no more than 35% of national TV households, except that a UHF station is attributed as "reaching" only fifty percent of households in its DMA.

² By "economic efficiency" we mean here the achievement of the maximum total benefit to all the affected parties, where benefit is measured in terms of its dollar equivalent and where a dollar of benefit to any party is given equal weight. Competition is often seen as an instrument for achieving economic efficiency (under certain conditions), but it may also be viewed as an independent policy goal.

³ See, e.g., Napoli (2001), chapter 9.

⁴ The ultimate objective may be to foster a strong sense of community and local identity. Noll et al. (1973, p.108) quote Commissioners Kenneth Cox and Nicholas Johnson as characterizing localism as follows: "A system of locally based stations was deemed necessary to ensure that broadcasting would be attentive to the specific needs and interests of each local community. [...] Ultimately, our broadcasting system is premised on concern that the very identity of local states and cities might be destroyed by a mass communications system with an exclusively national focus."

⁵ Noll et al. (1973, pp. 100-111) argue that the FCC's decision to offer geographically limited licenses was motivated by localism as defined above, and they illustrate that such a decision was sometimes made even if it implied a reduction in network competition and presumably economic efficiency.

⁶ 47 C.F.R. § 73.658(e).

constraining the types of contractual arrangements or financial inducements a network may use to influence a station's programming choices. Observe that for purposes of advancing localism, the Right to Reject Rule and the Cap are strongly complementary: The Rule constrains broadcast networks from obtaining control rights over stations' decisions through contracts, while the Cap constrains their ability to attain such control in additional markets through ownership.

Several objections have been raised against the Cap as an instrument for advancing localism: that network-owned stations would have the same incentives as affiliates to respond efficiently to local interests; that the policies primarily serve to transfer profits from networks to affiliates without having any immediate impact on viewers; and that the growth of video alternatives to broadcast networks has voided any rationale for retaining these policies.⁷ Our analysis examines these arguments and attempts to clarify the relevant economic tradeoffs.

A network and its affiliated stations share obvious common interests because affiliates benefit from better network programming, while the network benefits from better distribution channels – stations that serve their local communities and are perceived to do so effectively. However, a station will sometimes wish to depart from the network's schedule to air a show that is more likely to appeal to the particular local audience.⁸ The network will be less sensitive than an affiliate to the interests of the affiliate's local community for two reasons. First, the network's benefits from promoting its shows come from additional sources, including foreign sales, syndication, and distribution over non-broadcast platforms such as cable or the Internet. Second – and our principal focus – the network's defining feature is its role as a supplier of a national programming schedule to stations in numerous markets, and its income from national advertisers depends on obtaining widespread and synchronized “clearance” of its program schedule. The network will therefore have powerful reasons to resist “preemptions” by affiliates and enforce adherence to its nationally-uniform schedule. By contrast, a non-network station-group owner will not have comparable incentives to impose significant uniformity of programming on its member stations, since it typically does not provide a programming schedule (indeed, station groups frequently include affiliates of multiple networks).

The Cap can therefore be seen as a policy choice to promote localism by limiting the ability of networks to influence programming choices of stations. Choices made by an independent affiliate typically will be more closely targeted to the interests of the viewers and local advertisers in its license area than would choices of a station owned or controlled by the network, given that the network has a geographically much broader orientation. By permitting networks to own more stations, relaxation or elimination of

⁷ Some or all of these objections can be found in Disney (2001), Fox (2001), Katz (1999), and Network Petitioners (2001).

⁸ Contentious departures from the network's schedule need not be primarily for purposes of airing local news or local public affairs programming. Indeed, one would expect networks to perceive a clear interest in letting affiliates provide attractive local content that is complementary to (rather than a close substitute for) the network's national programming. Thus, the conflict may arise primarily over preemption of the network's entertainment and other nationally-oriented programs in favor of comparable material from syndication or other sources that, in the station's judgment, would better appeal to the local audience. Such preemptions are therefore also consistent with advancing localism, despite the absence of local content.

the Cap will bring about greater uniformity of programming choices across the country compared to a model where more stations remain affiliates and – assuming the integrity of the Right to Reject Rule – preserve some discretion over programming.

Of course, the pursuit of localism typically requires a tradeoff with other goals. Integration (or unrestricted contracting) would allow the network and its affiliates to make decisions – including about what gets shown when – that maximize their combined profit. Conversely, the Cap is likely to reduce the total profit of networks and stations and may well reduce network investments in programming. If the latter occurs, it would be a source of harm to viewers in all localities.⁹ Whether the benefits from localism justify these costs cannot be answered based on economic analysis alone. The answer will depend in large measure on the relative weight placed on the value of localism.

Another implication of our analysis is worth noting. The Cap does not appear to systematically strengthen the bargaining power of individual affiliates in negotiations with their network – for renewal of the affiliation or, absent a binding cap, for sale of the station to the network – and, hence, does not appear to increase the profit that affiliates can attain. Briefly, the logic is as follows. The economic theory of bargaining predicts that, when an affiliate bargains with its network, the profits that will be attained by the two parties will depend on (a) their strategic power, (b) the total profit that results if agreement is reached, and (c) the profit each party could earn if there is no agreement – their “outside options.” The Cap is likely to affect items (b) and (c). Regarding (c), the network’s outside option if negotiations fail with its preferred station, A, is to reach an affiliation agreement with another local station, B, or (absent the Cap) to integrate with B. By denying the possibility of integration, the Cap reduces the value of the network’s outside option when negotiating with A, an effect that favors station A in the bargaining. However, the Cap also reduces (relative to no Cap) item (b), the joint profit available to be shared between the preferred station A and the network, because they too are precluded from integration. This effect works to the station’s detriment, and is more likely than not to outweigh the first effect. Thus, the profit that an initial affiliate could collect by selling the station to its network absent a binding cap is likely to exceed the profit the affiliate could earn by remaining an affiliated station under a binding cap.

Although we focus on the role of the Cap in achieving localism, the Cap may also serve to promote viewpoint diversity. Consider an environment where there exist significant differences in the audience share of stations within each local market. The strongest stations will be able to exert the greatest influence on public opinion and viewpoints. With no Cap, one might expect the strongest stations in each market to be purchased by entities that can exploit economies of scope across markets, such as the networks. By limiting their ability to do so, the Cap ensures that many strong independent stations and, therefore, many different *effective* viewpoints remain available to the public.

A central contention is that whatever merit the Cap once may have had, today it is at best redundant because of the growth of alternatives to broadcast networks, such as

⁹ Nevertheless, viewers in localities whose preferences are sufficiently different from those of the “average” national viewer – at whom network programming is aimed – will still be better off relative to no Cap due to the increased programming flexibility of affiliates to respond to local tastes.

independent stations and, more dramatically, cable networks. However, although broadcast networks have experienced a considerable decline in their share of viewers, their significance in the marketplace remains considerable. Indeed, despite the growth of alternative programming channels, there are sound reasons to think that the Cap retains a significant role in preserving an ability to respond to differences in local tastes. The new programming channels are less suited for this purpose than are affiliates of the major networks.

Consider first cable networks, which in their totality have experienced by far the greatest increase in market share of viewers (largely mirroring the decline in broadcast networks' share). Cable network programming, to our knowledge, is still predominantly uniform nationally, offering less scope to address idiosyncratic local tastes. Although the number of broadcast TV stations has also risen, many of them have affiliated with (the smaller) networks. As for the non-affiliated stations, their market presence is generally weak. First, the networks have typically picked out the stronger local stations. Second, there are presumably strong economic efficiencies to the network model – as evidenced by its ascendance – so that a station that is non-affiliated would lack important advantages needed to attract a large audience.

The latter observation implies that viewers would suffer considerable harm if the network model were gutted – e.g., by granting affiliates unfettered ability to deviate from their network's schedule. However, that is not what the current regulatory system does. Rather, it recognizes the efficiencies of the network model, but seeks to preserve *some* degree of affiliate flexibility in a significant percentage of markets. Instead of the polar cases of no networks or networks owning (or fully controlling through contract) all their stations, the current regime is one where the network platform is dominant but some affiliate flexibility is preserved for stations to cater to local differences.

II. Networks and Stations: Their Economic Functions and Incentives

A. Economic Functions

We highlight a few of the most important activities of networks and stations that help illustrate the role and effects of the Right to Reject Rule and the ownership cap.¹⁰

The economic function of the television broadcast industry is to provide video content to viewers and a viewing audience to advertisers. Part of the video content is advertising and the revenue it generates funds the remaining content (hereinafter, “content” denotes the non-advertising content). Local stations are the conduits through which the content is distributed to viewers in the particular geographic localities served by the stations.

Video content is obtained from three main sources: some content, such as local news, is created by the station itself; some programs are supplied by program syndicators; and, in the case of affiliated and network-owned stations, a schedule of programs is obtained

¹⁰ The ensuing discussion draws on Katz (1999), Owen and Wildman (1992), and, especially, FCC Network Inquiry Special Staff (1980), *An Analysis of the Network-Affiliate Relationship in Television* (“*Network Inquiry*”).

from the respective broadcast networks.¹¹ Programming from the first two sources is paid for directly by the station. In return, the station receives virtually all the advertising revenue generated by the programs.¹² The case of network-supplied programming is different. The stations are allotted a portion of the advertising slots on the network programs. The remaining advertising slots are sold by the network as national advertising and serve as the network's primary source of revenue for its programming.¹³ Stations may also receive a fee from a network to carry its programs (the per-program fee is called "compensation") or pay a fee to the network.¹⁴

The special features of its product serve to differentiate a network from other content providers.¹⁵ Syndicated and locally-produced programming is rarely bundled with other programs and there is little effort to ensure simultaneity of exhibition across markets. In contrast, the network packages its collection of programs, distributes them to viewers via local stations, and exhibits its schedule to a nationwide audience simultaneously (at least, within a given time zone). Thus, a network bundles programs across time – an affiliated station rarely obtains a single network program but instead airs the whole schedule subject to a limited number of preemptions – and it bundles across geographic markets – the same program is being aired at the same (local) time nationwide by all the network's owned stations and participating affiliates.

A network is also an owner of multiple local stations. Of the stations not owned by networks – both independents and network affiliates – the majority are owned by station "group owners", entities that own two or more stations. Although station groups are also subject to the 35% ownership cap, their functions are quite different from those of networks. A group owner provides managerial and financial resources to its stations, and may assist in purchasing syndicated programs; but it does not supply them a program schedule – indeed, a given station group will often include affiliates of different networks. Thus, a network's role as a program bundler differentiates it from a group owner. A network-owned station may be willing to compromise some immediate local community satisfaction (and station-based advertising revenues) in order to promote the overall interests of the parent network's program schedule.¹⁶

Although there remain significant questions about why networks' behavior exhibits this bundling function, a variety of explanations suggest the arrangements can increase

¹¹ Owen and Wildman (1992), p.159.

¹² We understand that a small share of advertising time may go to syndicators.

¹³ *Network Inquiry* (1980), pp. 221-230.

¹⁴ Owen and Wildman (1992), p. 168.

¹⁵ See Katz (1999), p. 48 for this view of the network as a provider of content.

¹⁶ The DC Circuit (2002) quotes the FCC (1984) as stating it had "no evidence indicating that stations which are not group-owned better respond to community needs, or expend proportionately more of their revenues on local programming." Our analysis suggests that (a) the emphasis on local programming is too narrow and (b) that one should distinguish between network and non-network group owners. Networks will have much stronger incentives to impose uniformity of national programming (i.e., adherence to their schedules). From the standpoint of localism, there is therefore reason to question the FCC's (1984) statement that "We do not believe that the three broadcast networks when they function as group owners should be treated differently from other groups."

economic efficiency.¹⁷ The provision of a schedule of programs allows networks to internalize an externality known as “audience flow” – the tendency of audiences to remain watching the same channel across shows. It also creates an incentive for the network to engage in “branding” activities that may help differentiate it from other programmers.¹⁸ As for bundling across regions, some programs such as many sports events, awards shows and perhaps even some entertainment shows obviously receive their maximum audience through simultaneous exhibition.¹⁹ Simultaneous broadcasting may also be a response to the desire of national advertisers for a predictable audience demographic and a particular time of viewership. Whatever the reason, the networks stress that their ability to ensure simultaneous airing of the great majority of their programs in various markets is very important.²⁰

B. Common Interests But Also Conflicting Incentives: Networks’ Stronger Interest in Uniformity

A network and any of its affiliates share obvious common interests. The network seeks efficient distribution outlets, and therefore benefits if its schedule is aired by stronger local affiliates. Stations, by choosing to affiliate with the network, demonstrate their preference for obtaining a major part of their programming from that network, and therefore also benefit from the success of the network’s schedule.

Nevertheless, the interests of a network and its affiliates at times will diverge. Consider the following stylized example. Suppose, hypothetically, that the network offers to all its affiliates a menu of programs and a constant share of advertising time on any of the programs.²¹ Suppose also, purely for simplicity, that the combined profit of the network and its affiliates would be maximized if each affiliate aired all the shows. However, given that affiliates face heterogeneous local markets and that each affiliate is oriented towards its particular market, affiliates will disagree over the relative attractiveness of the network’s various shows. This makes it likely both that each station will reject some shows and that the pattern of rejections will differ across stations.

¹⁷ The FCC’s *Network Inquiry* (1980) describes some of the puzzles extensively in its Chapter IV, “Characteristics of the Network System”.

¹⁸ The importance of branding activities in order to differentiate networks from each other is emphasized in Levy et al (2002) pp. 115,128.)

¹⁹ When an incentive to bundle across time is also present due to, for example, audience flow effects, then even shows which have no intrinsic value in simultaneous broadcasting, inherit this value from other shows in the bundle which do.

²⁰ Fox (2001) states: “ ‘In pattern’ clearance [the airing of network programming in its scheduled time period] of the Fox network programming by its affiliates is critical to the network’s sale of national advertising...” (p. 10.) Viacom (2001), commenting on the harm to the network from an affiliate’s failure to clear a show, states: “Most importantly, the fact that broadcast network advertising is the most efficient way to target virtually 100 percent of television homes gives it a unique value to advertisers. To the extent that advertisers are unable to cover nearly all television homes with a single network buy, the attractiveness of broadcast networks as a vehicle for national advertising will be diminished and prices will erode.” (p. 20). See generally also Disney (2001).

²¹ The analysis is unaffected if there are also fixed payments from the network to an affiliate or vice versa, or by payments per-program aired, as long as the per-program payment does not depend on the number of programs aired by the affiliate. Departures from this scenario are discussed shortly.

These independent programming decisions by affiliates come at a cost. The network's shows will fail to secure nationwide coverage, thereby reducing the total profits that potentially could be shared by the network and the affiliates relative to what could be achieved if each station aired every show. In making its individual profit calculation when rejecting a network's show, a station does not take into account the full harm that such rejection causes to the effectiveness of network advertising, and hence to the network's revenue and incentives to invest in programming. At the same time, independent decisions by affiliates advance a policy goal. By ensuring that each station's programming is more closely oriented to its market, autonomous decision making promotes localism.

Networks and stations will have strong incentives to adopt contracting arrangements to address the externality described above. Such arrangements could involve integration – ownership of the stations by the network – or more complex contracting terms than described in the example above. Importantly, a move toward such joint-profit maximization would reduce the number of rejections in each market and, because all stations would now air a larger portion of the network's schedule, would increase the degree of uniformity in programming decisions across markets. The next section explains how the FCC's ownership Cap and Right to Reject Rule seek to constrain such efforts and thereby act against uniformity.

III. Likely Effects of the Cap

Obviously, if the network owns the local station, it can ensure that its interests in uniform programming are respected directly. The Cap, however, limits such vertical integration by networks. The Cap is not sufficient, however. In markets where a network does not own stations and thus must deal with affiliates, there would still be strong incentives to induce programming decisions that maximize joint profit – hence imply greater uniformity – by adopting more complex contractual terms.²² The Rule, however, aims to prevent the network from acquiring the rights over certain kinds of programming decisions through contract. It prohibits contractual obligations on the affiliate to clear all the network's schedule ("full clearance"). The FCC also bars steeply graduated compensation schemes or other financial inducements that could be used to discourage an affiliate from preempting a network's programs.²³

The Rule maintains the integrity of the Cap by preventing networks from mimicking the effects of ownership by arms-length contracts. Thus, from the standpoint of maintaining

²² Standard economic theory suggests that, in the absence of constraints on efficient bargaining, if the network values uniform programming more than an affiliate values flexible programming, then the two parties will find a way to come to a jointly efficient agreement that involves uniform programming (and possibly some additional monetary transfer to the station to the extent that it values flexibility higher than does the typical affiliate). Indeed, a typical affiliation contract specifies which programs will be carried, determines a compensation scheme for when programs are not cleared and, typically, places a limit on the total number of preemptions of network programs a local station may exercise. NBC (2001), p. 10.

²³ The FCC limits the degree to which compensation can vary program by program. (*Network Inquiry*, p. 149).

“localism” in the sense of licensee’s discretion over programming decisions, the Rule and the Cap are complementary policies: without the Rule, networks could acquire programming-control rights (or an approximation thereof) through contracts; without the Cap, networks could obtain control rights through ownership of stations.

It is sometimes claimed that disputes over the Rule and the Cap are unlikely to affect localism objectives, but instead are largely a struggle over the division of profit between networks and their affiliates.²⁴ We first explain, subsection A below, why economic theory suggests that the Cap (and the Rule) has no clear cut effect on affiliates’ profits, that is, the effect can be positive or negative. A formal model underlying this analysis is presented in the Appendix. Next, we reiterate why the Cap is likely to systematically affect viewers. Thus, the controversy over the Cap is not “only a fight about money.” It is a controversy over the proper level of programming flexibility of affiliates.

A. The Cap Has No Obvious Impact on Affiliates’ Profits

This section scrutinizes the claim that the Cap serves to benefit affiliates at the expense of networks.

Suppose that an affiliated station, A, is bargaining for a new agreement with its network, N, for renewal of the affiliation or, absent a binding cap, for sale of the station to the network. We are interested in whether the station is likely to earn greater profit when the cap is binding and the only option is continued affiliation, or by selling out to the network when the cap is not binding.

If they fail to reach agreement, each party resorts to its next-best-alternative, earning a profit level that economists term that party’s “outside option.” Denote the outside options to the station and the network, respectively, by V_A and V_N . If they do reach agreement, their combined or *joint* profit is $V_{N\&A}$. The joint profit depends on the regulatory environment, because the latter influences the nature of the arrangement that A and N can implement conditional on reaching agreement. Specifically, without an ownership cap, N can purchase A and operate it in a way that maximizes combined profits. With a cap that is binding,²⁵ N will be forced to a less-desired outcome – continuing to deal with A contractually as an affiliate (subject to the Right to Reject Rule).²⁶ (Alternatively, N would have to divest one or more stations elsewhere, a course

²⁴ For example, commenting on the NASA Petition (2001), Fox (2001) writes: “This dispute is not, as NASA would have the Commission believe, about licensees’ control over their stations or stations’ programming decisions. ... Most important, the dispute does not implicate the public interest. Rather, it is an attempt to convince the Commission to interpret fundamentally outdated rules and policies in a manner that will benefit affiliates’ private business interests.” (pp. iii-iv.) Similar views can be found in the comments of Disney (2001): “This matter concerns the extent to which the Commission should intervene in private business negotiations, not for any discernible public benefit, but simply to fine-tune the ‘balance of power’ ... between two parties to a voluntary contract.” (p. i.)

²⁵ That is, station A plus the stations owned by N in other markets would collectively reach more than the maximum share of TV households nationally allowed by the cap, hence the acquisition of A would violate the cap.

²⁶ Katz (1999, pp. 55-58) argues that the Cap imposes economic inefficiencies by denying several benefits of vertical integration relative to arm’s length contracting: better exploitation of economies of scale or

which it also finds harmful.) Thus, the joint profit of A and N will be lower with a binding cap than without it.

The total “gain from trade” G is the difference between the joint profit conditional on reaching agreement and the sum of the two outside options: $G = V_{N\&A} - (V_A + V_N)$. Standard economic theory of bargaining predicts that this gain will be shared between the parties in proportion to their relative strategic power, which usually depends on their degree of patience, their bargaining skills and perhaps their private information. Denote by s the share of G obtained by the station (hence $1-s$ is the share obtained by the network). Station A’s profit if agreement is reached will be its outside option *plus* its share of the gain from trade, $V_A + sG$. To determine how a cap influences station A’s profit, we must determine how it influences each of the three terms V_A , s , and G .

There is no obvious reason to think that a cap systematically alters the above-mentioned factors that influence the strategic power of the station or the network, and therefore alters the bargaining share s .²⁷ The Cap’s impact on each party’s profit will mainly depend on how it affects the gains from trade G and that party’s outside option. Station A’s outside option if agreement is not reached with N is to operate as an independent, and the presence or absence of a cap is unlikely to have a significant effect on the value of this outside option, V_A . The effect of a cap on A’s profit (conditional on reaching agreement with its network) will therefore be determined by its effect on the size of the gain from trade, G . Recalling that $G = V_{N\&A} - (V_A + V_N)$ and that V_A is (approximately) unaffected by a cap, we see that a cap’s net impact on A’s profit will boil down to how it affects two terms: the joint profit given agreement, $V_{N\&A}$, and the network’s outside option in the event of no agreement, V_N .

When negotiating with its preferred station A, network N’s outside option is the profit it would earn if instead it reached agreement with station B.²⁸ If there is a cap and it is binding on N, then the value of N’s outside option, V_N , is likely to be lower than under no cap, since a cap prevents N and B from maximizing their combined profits through integration.²⁹ By worsening the network’s outside option if it fails to reach agreement with station A, a cap therefore acts to increase the profit that A can extract in the bargaining. However, there is a second and opposite effect. As noted earlier, a cap also

scope through common ownership of multiple stations, expansion of especially well-run station groups, and, “perhaps most important today”, improved coordination and alignment of incentives between a network and stations. Regarding the latter, he notes that contracting can be inferior to integration because of difficulties in internalizing the benefits from investments in new programming and because contracting is constrained by government regulations (such as the Right to Reject Rule). We treat the loss of any such efficiencies as part of the costs of localism policies to be compared against the corresponding benefits.

²⁷ A similar point was noted by Katz (1999, p. 65, concerning effect of the Cap) and Owen and Wildman (1992, p. 179, concerning the effect of the Right-to-Reject Rule).

²⁸ If there is no other available local station, then with or without a cap, the network’s outside option is the same – to lose presence in this market (that is, $V_N = 0$ in either case). The ensuing argument in the text shows that in such a case – i.e., when a cap leaves the network’s outside option unaffected – a cap is likely to reduce station A’s profit (because it reduces the joint profit $V_{N\&A}$ available to be shared between station A and network N, without bringing about any countervailing effect that might benefit the station).

²⁹ Alternatively, as noted earlier, N could acquire B but would be harmed by having to undertake divestiture of stations elsewhere.

reduces the joint profit, $V_{N\&A}$, that A and N could attain, for the same reason: it also prevents them from maximizing their combined profit through integration.

Thus, a binding cap will increase (relative to no cap) the profit that station A can earn conditional on reaching agreement with its network N if and only if the cap reduces the network's outside option V_N by more than it reduces the joint profit $V_{N\&A}$. Focusing only on the former effect, the negative impact of a cap on the network's outside option, leads to the inappropriate conclusion that a cap must make the network more eager for a deal with an affiliate and therefore renders the network a weaker bargainer. The concurrent negative impact of a cap on the network/affiliate joint profit, however, dampens and quite likely reverses this effect.

To see why a cap is unlikely to increase the profit of an affiliate, consider a simple example where the cap simply lowers by a fixed amount, D , the total profit achievable for any station-network pair. Thus, $V_{N\&A}$ falls by D when a cap is imposed. What happens to the network's outside option? The maximum achievable gain from the network dealing with an alternative station, B, has also fallen by D . If negotiations between the network and station B result in the network's gaining a share $1-s'$ of the net gains from trade, this implies a fall in the network's outside option (vis-à-vis station A) of $(1-s')D$. That is, V_N falls by $(1-s')D$ which is no more than the fall in $V_{N\&A}$ (and is strictly lower if $s' > 0$). Thus, in this canonical case, the net profits that can be captured by the affiliate – through continued affiliation under a binding cap or through selling out to the network absent a binding cap – are no higher with a binding cap. The same result holds if, instead, the cap reduces by the same *proportion* (as opposed to absolute amount, D) the joint profit that the network can achieve with either station.

B. The Cap Can Be Expected to Affect Viewers

The Right to Reject Rule (and related provisions that prevent networks from circumventing it, such as restrictions on compensation plans that induce full clearance) aims to maintain control over programming decisions in the hands of the local licensee even in cases where maximization of the combined profits of the network and affiliate would call for the licensee to “sell” those rights to the network. The Cap similarly prevents a network and its affiliates (in markets exceeding the Cap) from using common ownership to “agree” on the actions (programming choices) that maximize combined profit. The logical implication is that whenever these constraints bind on the parties, they will alter programming choices – and therefore will affect viewers.³⁰ Gauging the

³⁰ A possible illustration is provided by a recent episode involving the notorious snipers in the Washington DC area. According to the Washington Post (Friday, October 4, 2002, p. C07), shortly after the fifth person in under sixteen hours was killed in Montgomery County, all Washington TV stations with news operations were veering in and out of the story. “Surprisingly, NBC-owned Channel 4, the only one with a regularly scheduled 10 to 11 a.m. newscast, opted to switch at 11 a.m. to its regularly scheduled ‘John Walsh Show.’ By then schools were being locked down because the sniper was still at large, but WRC [Channel 4] ceded the story, at least temporarily, to its competitors. ... The syndicated ‘John Walsh Show,’ which debuted a month ago and has been struggling in the ratings, is also owned by NBC.” WRC’s News Director stated that the decision to break away from the news coverage “had nothing to do with Walsh,” and was motivated by other considerations. Nevertheless, it is interesting that the other local stations chose to stay with the story.

magnitude of this effect, however, requires access to information that is not publicly available.³¹

The argument that these policies should be discarded solely because they interfere with private contracts and reduce overall profit is therefore not persuasive: It overlooks the policy interest in preventing a licensee from surrendering programming discretion – even when doing so would increase combined profit.³² The same criticism applies to the argument that the “only” penalty to an affiliate for preempting network programs beyond the pre-negotiated allowable basket of preemptions is to compensate the network for lost advertising revenue.³³ Under such a compensation scheme, an affiliate would preempt only when doing so would increase joint network-affiliate profits. The Rule, however, seeks to maintain affiliates’ independent decision making on preemptions in a broader set of cases.

C. The Cap Can Advance Viewpoint Diversity

This report focuses on the benefits of the Cap for localism. However, the Cap can also provide benefits to viewpoint diversity. It has been argued that the Cap does little to advance this goal, because “the most important idea markets are local.”³⁴ Granting this premise, however, there can still be a role for the Cap in promoting viewpoint diversity, as illustrated by the following simple example.

The nation is made up of two markets, East and West. A viewer in each market has access to two stations, a strong and a weak station. Consider two scenarios. In Scenario A, every station is owned by a different owner. In Scenario B, which would correspond to repealing the national Cap, both strong stations are owned by a single owner (the “network”) and no weak station is jointly owned. Abstracting from economies of scale and networking, it seems clear that, even if the only stations that the typical viewer in the East sees are the two local stations, the opportunities for him to be exposed to different viewpoints are fewer under Scenario B than A. In each case, it is true that the viewer only sees, directly, programming generated by the different owners of his local stations. However, he is highly likely to be affected indirectly by successful (and different) programs shown in the West. He may read reviews of popular West station programs or hear other people talk about them. He may also be exposed to investigative news stories

³¹ For instance, it would be useful to know whether stations owned and operated by a network exhibit higher clearance rates (fewer preemptions) for their network programs than do affiliated stations. It would also be useful to know whether the same pattern held some five or ten years ago, when – according to affiliates – networks allowed affiliates greater programming discretion, such as larger preemption baskets. To reach an informed decision about the desirability of altering the Cap, it is important to obtain additional information about these issues.

³² Contrast, for example, the claim by Disney (2001, p.23, italics in original): “Although the programming incentives of networks and affiliates are of course not perfectly aligned, the product of *negotiations* about that programming will fully protect the ‘localism’ interests that ostensibly underlie NASA’s position here.”

³³ NBC (2001), p. 13

³⁴ NPRM 2002, par. 133, quoting from 1984 Multiple Ownership Order, paragraphs (?) 81-82. See also NPRM 2002, paragraph 136.

conducted by the strong West station. For example, the station in the West may choose to investigate a prominent AIDS researcher's claim to discovering HIV or to investigate government corruption, while the East station decides to pass on the stories. If these investigations are successful and important, they can be expected to have an impact on the East viewer even when he does not view the broadcasts directly.

Insofar as such cross-market effects are significant, there need not be an inconsistency between the FCC's policies of preserving the national Cap while allowing a network to acquire two stations in a given local market. To see this, modify the above example to add a third Scenario C: the owner of the strong East station buys the weak East station and consolidates much of the programming decisions but -- because of a Cap -- that owner is not allowed to control a station in the West. Even though the East viewer is directly exposed to fewer viewing options, if the second station is weak, the diversity of effective viewpoints available under Scenario C could still be greater than under Scenario B. Thus, national consolidation can be more harmful than local consolidation in cases where the latter would not have a great impact on the number of effective local viewpoints. Observe that the FCC's current local TV multiple ownership rule allows an entity to own two stations in a market *only* if there will remain many other strong stations. Thus, a policy of promoting viewpoint diversity is consistent with allowing some limited local consolidation, while preventing certain national consolidations as done by the Cap.

Finally, note that an interest in viewpoint diversity does not imply that a national ownership limit should apply to the number of stations owned rather than their audience reach as done under the Cap. It is simplistic to just count the number of independent stations as a measure of the degree of meaningful viewpoint diversity. The effectiveness of a viewpoint depends on the resource available to support it (e.g., a well-funded news operation is more likely to develop credible and interesting stories that command attention). It has been widely claimed that significant efficiencies accrue from the total size of the audience reached by an owner. Thus, we can expect the effectiveness of a given viewpoint to increase with the resources devoted to establishing it, which in turn, rise with market reach. The FCC can therefore sensibly accept some reduction in the *number* of viewpoints (by allowing greater market reach of an owner) in exchange for an increase in the *effectiveness* of viewpoints.

IV. Despite Increased Video Alternatives, the Broadcast Networks Remain Significant

Television competes to some degree for audience and for advertising with other media such as radio, newspapers, and the Internet. Nevertheless, these alternative media are not such close substitutes to television – for providing key services such as entertainment – as to make them essentially interchangeable in attracting “eyeballs” and advertisers. (Waldfoegel, 2002; Bush, 2002.) Television remains sufficiently distinct and important that it can be meaningfully analyzed for certain policy purposes without being aggregated with various other media.

Within the television marketplace, there has also been considerable growth of alternatives to the major broadcast networks. Most striking is the proliferation of so-called “cable networks” that are delivered by multichannel video programming distributors (MVPDs) through non-broadcast conduits, mainly cable facilities and direct-to-home satellite broadcast (also known as DBS). These alternative outlets have been employed both by new competitors and by the parent companies of the major broadcast networks to launch new programming channels. The number of local television stations has also risen.³⁵

Have these developments eroded the market position of the major broadcast networks so much that regulatory policies aimed at them, including the Right to Reject Rule and the ownership Cap, become largely ineffective in advancing purported objectives such as localism? Our reading of the evidence is that the major broadcast networks in fact remain economically quite significant.

Consider shares of the viewing audience, between 1984/85 and 2000/01. For the major broadcast networks (ABC, CBS and NBC throughout, plus Fox from 1994/95), their share of all day viewing fell from 63.5% to 37.4%, while the share for cable networks (Basic and Pay channels) rose from 13.5% to 46.5%.³⁶ The rise in cable’s share and the decline in that of broadcast networks are certainly impressive, but broadcast networks retain a considerable presence. Measured by share of viewing in Prime Time rather than all day, the changes over the same period have been somewhat smaller: cable’s share (Basic plus Pay channels) rose from 12.1% to 41.7%, while broadcast networks’ share fell from 69.2% to 49.6%.³⁷

Thus, despite the loss in viewer share to the burgeoning cable presence, broadcast television, especially network-based broadcast television, remains a significant component of the video market. The decisions by Warner Brothers, UPN and Pax to each enter the broadcast network business despite the presence of ABC, CBS, NBC and Fox as well as of cable networks, indicates, at least initially, that the business was seen as robust. In 2000, the average number of primetime households for the top four cable networks (USA, TBS, Lifetime and Nick at Night) was 1.4 million. During the 1999-2000 season, the average for the four major broadcast networks (ABC, CBS, NBC, and Fox) was 8.2 million per network, almost six times as high as for the top cable networks. Even the new broadcast networks UPN and WB had audiences almost twice as big as the largest cable networks.³⁸ In May 2002, broadcast networks accounted for 92 of the 100 shows with the top primetime ratings.³⁹

The persisting importance of broadcasting (networks and independents) is revealed even more strongly in its share of advertising revenues. Between 1984 and 2001, broadcast’s

³⁵ A comprehensive and very useful survey of industry developments is provided in the recent FCC working paper by Jonathan Levy, Marcelino Ford-Livene, and Anne Levine, *Broadcast Television: Survivor in a Sea of Competition*. Federal Communications Commission, Office of Plans and Policy Working Paper 37, September 2002 (hereinafter, Levy et al. 2002).

³⁶ Levy et al. (2002), p. 21, Table 9.

³⁷ Levy et al. (2002), p. 23, Table 10.

³⁸ Levy et al. (2002), pp. 25-26.

³⁹ Levy et al. (2002), pp. 23-24, and 38.

advertising revenues rose from \$19.3 billion to \$38.9 billion, while cable's rose from \$0.7 billion to \$15.5 billion. Thus, broadcast's share of advertising revenues fell from 96.3% to 71.5%, a far smaller decline than in its audience share (90.7% to 53.7% over this period).⁴⁰

These figures indicate that advertisers clearly value broadcast television exposure much more than cable exposure.⁴¹ A key reason is that the large broadcast networks deliver much larger audiences on average, which has two advantages: it reduces the audience duplication, and it enables an advertiser to achieve a given exposure at lower transaction costs than if it had to negotiate with multiple cable networks.⁴² It is also relevant in this regard that the top broadcast networks reach virtually 100% of television households nationally, while the top figure for a cable network (TBS) is 82.7%.⁴³

Extrapolation of past trends suggests that cable networks will continue to increase their share of both the viewing audience and advertising dollars, while broadcast networks will continue to decline. However, Levy et al. (2002, p.136) point out that the growth rate of cable subscribership has flattened out, that the same is likely to occur with DBS, and that a simple extrapolation of trends suggests that the combined penetration of cable and DBS will peak at 80-85%. Since broadcast-network shows command a significant share of viewing even within cable homes, these observations suggest that broadcast networks are likely to remain economically significant for the foreseeable future.⁴⁴

Broadcast networks face competition not only from cable networks but also from independent television stations. However, the market position of the major broadcast networks relative to independents seems, if anything, to have strengthened. Between 1984/85 and 2000/01, the all-day viewing share among all television households of the major broadcast networks (ABC, CBS, and NBC, plus Fox starting with 1994/95) fell from 63.5% to 37.4%. Over the same period, the share of "independents" – including affiliates of the newer broadcast networks WB, UPN and Pax – experienced a greater proportional drop, from 20.2% to 10.2%.⁴⁵

⁴⁰ Levy et al. (2002), p. 47.

⁴¹ Levy et al. (2002), p. 27, note that the advertising "cost per thousand" for cable represents anywhere from a 30% to 60% discount compared to that for broadcast networks.

⁴² Levy et al. (2002), pp. 24-25.

⁴³ Levy et al. (2002), p. 11. In addition to the above, another possible factor may contribute to explaining the advertising premium of broadcast networks. For a given size audience, a higher fraction of the advertising messages are actually watched on broadcast-network shows than on cable network shows, because broadcast-networks shows are watched more attentively. If so, this would provide further evidence of the importance of broadcast networks.

⁴⁴ Levy et al. (2002), p. 139., conclude: "Broadcast television is certainly a survivor, even a vigorous survivor. Although [its] competitive position is likely to erode further, the fact that it is still delivering on a per-network basis audiences roughly five times the size of the largest cable networks suggests that any further decline is likely to be gradual." Earlier, they observe: "The relatively slow growth of individual cable network audience sizes suggests that even the mass appeal cable networks will not soon approach the audience size of broadcast television." (p. 48.)

⁴⁵ Levy et al. (2002), p. 21, Table 9.

Stations affiliated with the major networks generally attract larger audiences than do independent stations in the same local markets. One reason is that affiliates benefit from efficiencies of the network model, including access to the most popular programs. The enhanced reputations of those stations, as well as audience-flow effects, can be expected to help attract larger audiences also when airing non-network shows. In addition, the networks can be expected to have sought for affiliation those stations that already have a relatively strong local presence through their own efforts.⁴⁶ The net result of both factors is that, for purposes of addressing the interests of large local audiences, independent stations are unlikely to be an entirely satisfactory alternative to network affiliates that are permitted some flexibility to depart from their network schedule.

Cable systems and DBS also are unlikely to serve this purpose as well as network affiliates, though for a different reason. Through their carriage of multiple cable networks, such MVPDs do provide competitive alternatives to the national programming of the major broadcast networks; but our understanding is that, at least today, these delivery platforms remain limited in their carriage of local programming, as compared to broadcast-network affiliates.

V. Conclusion

Despite the emergence of competing media alternatives, the major broadcast networks remain a substantial force in the video marketplace. The national ownership Cap implies that, to reach the local markets that account for a majority of TV households, the networks today must collaborate with independently owned affiliates. The current system, where this collaboration is constrained by the Right-to-Reject Rule, is an intermediate one in terms of control over programming decisions. Affiliates are not granted unfettered discretion, and the network is not granted complete control.

The Cap and the Right-to-Reject Rule do not bestow any obvious negotiating power to affiliates. However, given an effective Rule, relaxing or eliminating the Cap would likely result in more uniformity of programming. Allowing a network to own stations in more markets would allow it to enforce adherence to its programming schedule in this additional set of markets. While such a move may well result in increased overall profit and, plausibly, increased network investment in programming, it also would remove affiliates' flexibility to make programming decisions. A consequence is that programming decisions would be aimed at a representative "national viewer" rather than being oriented towards specific local markets, thereby sacrificing localism.

⁴⁶ A suggestive piece of evidence is that the margins earned by independent stations have historically been lower than margins for network affiliates. (Levy et al. (2002), p. 32.) If all local stations were identical except for their affiliation status, it is not clear why the networks would permit their affiliates to earn higher margins than those earned by independents.

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Appendix: A Model of Network and Affiliate Bargaining With and Without the Cap.

The Model: There is one most efficient local station, A, and a less efficient station, B. (We assume A is more efficient with or without the Cap.) There is a potential network, N, such that affiliating or merging with the network raises overall profits.

We utilize the following notation:

No Agreement:

Stand-alone profits of A: V_A
Stand-alone profits of B: V_B

Agreement With No Cap:

Joint profits of A and N: $V_{N\&A}^{NC}$
Joint profits of B and N: $V_{N\&B}^{NC} < V_{N\&A}^{NC}$

Agreement With Cap:

Joint profits of A and N: $V_{N\&A}^C$
Joint profits of B and N: $V_{N\&B}^C < V_{N\&A}^C$

Assumption 1: Bargaining between N and A results in a share s to A of the net gains from trade (when positive).

Assumption 2: Negotiations (when necessary) between N and B results in a share s' to B of the net gains from trade (when positive). That is, Station B's gross gains are $V_B + s'(V_{N\&B} - V_B)$ and the network's gain is $(1-s')(V_{N\&B} - V_B)$.

Remark: We leave the details of negotiation with the non-incumbent affiliate unspecified. Two special cases simplify the analysis (but are not needed for the arguments that follow). If there are many stations that generate values similar to station B we can expect competition among the stations to result in $s' = 0$. If there is no alternative station, then we can expect $V_{N\&B} = 0 = V_B$.

We have the following table:

Regime	Cap	No Cap
Item		
Outside Option For Station A	V_A	V_A
Outside Option For N	$(1-s')(V_{N\&B}^C - V_B)$	$(1-s')(V_{N\&B}^{NC} - V_B)$
Joint Profits From Trade	$V_{N\&A}^C$	$V_{N\&A}^{NC}$
Net Gains From Trade N with A	$V_{N\&A}^C - (1-s')(V_{N\&B}^C - V_B) - V_A$	$V_{N\&A}^{NC} - (1-s')(V_{N\&B}^{NC} - V_B) - V_A$

Result 1: Station A's profits after negotiating with N are higher without the Cap if and only if

$$(V_{N\&A}^C - V_{N\&B}^C) - (V_{N\&A}^{NC} - V_{N\&B}^{NC}) + s'(V_{N\&B}^C - V_{N\&B}^{NC}) < 0.$$

This result can be seen by taking the difference of the two columns in the last row of the table and noting that Assumption 1 implies that with or without the Cap, the affiliate earns a share s of the net gains from trade.

Remark: Note that $(V_{N\&B}^C - V_{N\&B}^{NC})$ can be expected to be non-positive since any outcome that could be achieved with the Cap could presumably be achieved without the Cap as well. Thus, a *sufficient* condition for Station A's profits to be higher *without* the Cap is

$$(C1) \quad (V_{N\&A}^C - V_{N\&B}^C) - (V_{N\&A}^{NC} - V_{N\&B}^{NC}) \leq 0.$$

Another way to state this is “A is better off without the Cap if (but not only if) the increase in joint profits when the network deals with A rather than with B is higher without the Cap than with.”

Two canonical examples suggest that it is more plausible for the affiliate profits to be higher without the Cap.

Example 1: The Cap reduces the joint profits achievable by a network and any local station by an identical fixed cost: $V_{N\&A}^{NC} = V_{N\&A}^C + D$, $V_{N\&B}^{NC} = V_{N\&B}^C + D$, $D > 0$.

Example 2: The Cap reduces the joint profits achievable by a network and any local station by an identical proportion: $V_{N\&A}^C = fV_{N\&A}^{NC}$, $V_{N\&B}^C = fV_{N\&B}^{NC}$, where $f < 1$.

Result 2: In either Example 1 or 2, affiliate profits are higher without the Cap than with the Cap.

Reason: In Example 1, we can rewrite the expression in (C1) to get

$$\begin{aligned} (V_{N\&A}^C - V_{N\&B}^C) - (V_{N\&A}^{NC} - V_{N\&B}^{NC}) &= (V_{N\&A}^C - V_{N\&A}^{NC}) - (V_{N\&B}^C - V_{N\&B}^{NC}) \\ &= D - D = 0. \end{aligned}$$

In Example 2, we have

$$\begin{aligned} (V_{N\&A}^C - V_{N\&B}^C) - (V_{N\&A}^{NC} - V_{N\&B}^{NC}) &= (V_{N\&A}^C - V_{N\&A}^{NC}) - (V_{N\&B}^C - V_{N\&B}^{NC}) \\ &= -(1-f)(V_{N\&A}^{NC} - V_{N\&B}^{NC}) \\ &\leq 0, \end{aligned}$$

where the inequality comes because we assume that the incumbent affiliate is the most efficient station, so $V_{N\&A}^{NC} - V_{N\&B}^{NC} \geq 0$.

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EDUCATION

University of California, Los Angeles: Ph.D. in Economics, September 1982
University of California, Los Angeles: M.A. in Economics, March 1978
London School of Economics: B.Sc. in Economics (1st Class Honors), August 1976

PROFESSIONAL EXPERIENCE

Georgetown University, Department of Economics

Professor, June 1993–present (with intermittent leaves)
Associate Professor, August 1987–May 1993
Assistant Professor, January 1983–July 1987 (part time in Fall 1982)

Excellence in Undergraduate Teaching Award, Economics Department, 2001
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President's Council of Economic Advisers

Senior Staff Economist, June 1995–May 1996 (part-time consultant April & May 1995, June 1996).

Served as the senior economist responsible for antitrust, regulated industries, and other industrial organization matters. Work included: Telecommunications Act of 1996; competition in international satellite services; competition in the electric utility industry; reforming the patent and trademark office; intellectual property rights; international trade disputes; health care.

U.S. Department of Justice, Antitrust Division

Acting Deputy Assistant Attorney General for Economics, January 1999–June 1999

Economics Director of Enforcement, September 1998–December 1998, July 1999–April 2000

In these positions, I was responsible for overseeing economic analysis at the Antitrust Division of numerous mergers and non-merger matters in various industries, including:

Mergers & Joint Ventures—Ameritech/SBC, Bell Atlantic/GTE, AT&T/BT, Cargill/Continental, Aetna/Prudential, CBS/Viacom.

Monopolization—suit against American Airlines for predatory pricing (pending).

Regulatory—Bell entry into long-distance telecommunications services.

U.S. Department of Justice, Antitrust Division (continued)

Outside Expert

General Electric/Honewyell merger, 2000-01—prepared to serve as the testifying economic expert.

WorldCom/Sprint merger, 2000—prepared to serve as the testifying economic expert on Internet backbone issues.

Bell entry, 1996–1997—served as the DOJ’s outside economic expert on Bell company entry into long-distance telecom services long-distance telecommunications services, under section 271 of the Telecom Act, and submitted two affidavits on behalf of DOJ to the Federal Communications Commission..

Economist, January 1983–May 1995 (part time), October 1980–December 1982 (full time).

Expert Testimony

Presented written and oral court testimony in successful challenges of merger and of consent decree.

Mergers

Investigated mergers in several industries and helped to design appropriate relief.

Business Practices

Worked on vertical-restraints cases (tying, exclusive dealing, resale price maintenance, exclusive territorial arrangements) and horizontal-conduct cases (collusion and predation).

Legislation, Congressional Matters, Division Reports

Provided input to Antitrust Division’s Merger Guidelines (1992) and Vertical Restraints Guidelines (1984). Helped draft Division comments on various Congressional legislation and responses to inquiries in several areas including price discrimination and dealer termination.

Cooperation with Foreign Competition Authorities

Interacted with competition officials from several countries and agencies, and commented on various documents covering subjects such as predatory pricing, price discrimination, distribution systems, sole import distributorships, joint R&D, and the interaction between trade and competition policies.

Other Professional Experience

Management Group Associate, Economic Studies Program, American Institute for Contemporary German Studies, Washington DC, October 1997-present.

OECD: Lecturer in Seminar on Vertical Restraints for competition officials from Czech Republic, Hungary, Poland, and Slovakia in Cracow, Poland, November 20-22, 1995.

Consultant in private antitrust and regulatory matters.

ILADES: Participated in designing and teaching a short course in industrial organization to policy makers and executives in Santiago, Chile, June 1994.

Pew Freedom Fellows Program: Taught short course in microeconomics to twenty Fellows from transition economies, annually, January 1993–1999. (Fellows hold middle-level or upper-level positions in government and private business.)

Center for Economic Development, Slovakia: Academic Advisory Board.

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Abt Associates/USAID: Advised Government of Zimbabwe in Harare on formulating antitrust law, summer 1993 (consultant to Abt, work funded by USAID's Implementing Policy Change Project).

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French, Hebrew, Romanian (speak and read all three fairly well; write French and Hebrew adequately)

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U.S. Department of Justice, Antitrust Division: Special Achievement Awards
Brookings Institution: Research Fellow, 1979-80
University of California, Los Angeles: Earhart Fellowship, 1977-78
University of California, Los Angeles: Regents Fellowship, 1976-77
London School of Economics: Premchand Prize in Monetary Economics, 1976.

PUBLICATIONS

Refereed Journals

- "International Telecom Settlements: Gaming Incentives, Carrier Alliances, Pareto-Superior Reform," *Journal of Industrial Economics*, vol. 49 (September 2001): 335-377 (with David Malueg).
- "The Economic Logic for Conditioning Bell Entry into Long Distance on the Prior Opening of Local Markets," *Journal of Regulatory Economics (Practitioners' Section)*, vol. 18, no. 3 (2000): 247-288.
- "A Quality-Signaling Rationale for Aftermarket Tying," *Antitrust Law Journal*, vol. 64 (Winter 1996): 387-404 (with Gregory J. Werden).
- "The Non-Existence of Pairwise-Proof Equilibrium," *Economics Letters*, vol. 49 (1995): 251-259 (with R. Preston McAfee).
- "Equity as a Call Option on Assets: Some Tests for Failed Banks," *Economics Letters*, vol. 48 (1995): 389-397 (with Behzad Diba and Chia-Hsiang Guo).
- "Parallel Imports, Demand Dispersion, and International Price Discrimination" *Journal of International Economics*, vol. 37 (November 1994): 167-195 (with David Malueg).
- "Opportunism in Multilateral Vertical Contracting: Nondiscrimination, Exclusivity, and Uniformity," *American Economic Review*, vol. 84 (March 1994): 210-230 (with R. Preston McAfee).
- "Preemptive Investment, Toehold Entry, and the Mimicking Principle," *RAND Journal of Economics*, vol. 22 (Spring 1991): 1-13 (with David Malueg).
- "Patent Protection through Discriminatory Exclusion of Imports," *Review of Industrial Organization*, vol. 6, no. 3 (1991): 231-246.
- "Third-Degree Price Discrimination and Output: Generalizing a Welfare Result," *American Economic Review*, vol. 80 (December 1990): 1259-1262.
Reprinted in *Readings in Microeconomic Theory*, Manfredi La Manna Ed., Dryden Press, 1997.

- “Investments in Oligopoly: Welfare Effects and Tests for Predation,” *Oxford Economic Papers*, vol. 41 (October 1989): 698-719.
- “Entry Deterrence Externalities and Relative Firm Size,” *International Journal of Industrial Organization*, vol. 6 (June 1988): 181-197 (with Michael Baumann).
- “The Competitive Effects of Vertical Agreements: Comment,” *American Economic Review*, vol. 77 (December 1987): 1063-1068.
- “The Nature and Scope of Contestability Theory,” *Oxford Economic Papers*, vol. 38 Supplement (November 1986): 37-57.
This issue of the journal was published in parallel as *Strategic Behavior and Industrial Competition*, Morris et al. Eds., Oxford University Press, 1986.
- “The Perverse Effects of the Robinson-Patman Act,” *Antitrust Bulletin*, vol. 31 (Fall 1986): 733-757.
- “Divisionalization and Entry Deterrence,” *Quarterly Journal of Economics*, vol. 101 (May 1986): 307-321 (with Earl Thompson).
- “*Illinois Brick* and the Deterrence of Antitrust Violations,” *Hastings Law Journal*, vol. 35 (March 1984): 629-668 (with Gregory Werden).
- “Contestable Markets: An Uprising in the Theory of Industry Structure: Comment,” *American Economic Review*, vol. 73 (June 1983): 488-490 (with Robert Reynolds).

Monographs, Book Chapters, and Other Publications

- “Monopsony Concerns in Merger Review,” (with Susan M. Davies), American Bar Association Antitrust Section, Clayton Act Committee Newsletter, vol. II, no. 1, Winter 2002
<<http://www.abanet.org/antitrust/committees/computer/clayton/winter02.pdf>>
- “Conditioning the Bells’ Entry Into Long Distance: Anticompetitive Regulation or Promoting Competition?,” in Giuliano Amato and Laraine L. Laudati, Eds., *The Anticompetitive Impact of Regulation*, Edward Elgar, 2001.
- “Competitor Cooperation and Exclusion in Communications Industries,” in H. Davis and R. Dick, Eds., *E-Commerce Antitrust & Trade Practices: Practical Strategies for Doing Business on the Web*, Practising Law Institute, New York, 2001.
- “Buyer Power Concerns and the *Aetna-Prudential* Merger,” Address presented at 5th Annual Health Care Antitrust Forum, Northwestern University School of Law, October 20, 1999, posted on web site of Antitrust Division, Department of Justice: <http://www.usdoj.gov/atr/public/speeches/3924.htm>
- Discussant Comments on papers by Andrew Joskow, by Daniel Rubinfeld, and by Janusz Ordover and Margaret Guerin-Calvert, *Review of Industrial Organization*, Vol. 16 (March 2000): 219-223.
- Discussant Comments on papers by Patrick Rey and Ralph Winter and by Robert Anderson et al., in Robert D. Anderson and Nancy T. Gallini, Eds., *Competition Policy and Intellectual Property Rights in the Knowledge-Based Economy*, Calgary: University of Calgary Press, 1998.
- “Telecommunications Reform in the United States: Promises and Pitfalls,” in Paul J.J. Welfens and George Yarrow, Eds., *Telecommunications and Energy in Systemic Transformation*, Heidelberg and New York: Springer, 1997.
- “Protecting Intellectual Property by Excluding Infringing Imports: An Economist’s View of Section 337 of the U.S. Tariff Act,” *Patent World*, Issue 25 (September 1990): 29-35.

Review Essay of: Jean Tirole, *The Theory of Industrial Organization*, MIT Press, 1988. *Managerial and Decision Economics*, Vol. 11 (May 1990): 131-139.

Book Review of: J. Stiglitz and F. Mathewson eds., *New Developments in the Analysis of Market Structure*, MIT Press, 1988. *Journal of Economic Literature*, Vol. 36 (March 1988): 133-135.

“Vertical Restraints,” published in German by *Forschungsinstitut für Wirtschaftsverfassung und Wettbewerb* by E.V. Köln, Heft 5, 1984.

REGULATORY FILINGS, DISCUSSION PAPERS AND WORK IN PROGRESS

“Same Price, Cash or Card: Vertical Control in Payment Networks” (with Daniel Vincent), Georgetown University, Department of Economics Working Paper 02-01, February 2002, <<http://econ.georgetown.edu/workingpapers/>>

“Interconnection Incentives of a Large Network,” (with David Malueg), Georgetown University, Department of Economics Working Paper 01-05, revised January 2002 <<http://econ.georgetown.edu/workingpapers/>>

“Exclusive Dealing, Product Differentiation, and Rent Extraction,” in progress (with Serge Moresi and Francis O’Toole).

“Are Spectrum Limits Needed to Preserve Competition?” paper submitted on behalf of CTIA to FCC in *2000 Biennial Regulatory Review Spectrum Aggregation Limits for Commercial Mobile Radio Services*, WT Docket No. 01-14, Notice of Proposed Rulemaking (rel. Jan. 23, 2001), April 13, 2001 (with John Gale).

“The Appropriateness of Nondiscriminatory Access Regulation for Interactive Television,” paper submitted on behalf of NCTA to FCC in *Nondiscrimination in the Distribution of Interactive Television Services Over Cable*, CS Docket No. 01-7, Notice of Inquiry (rel. Jan. 18, 2001), March 19, 2001 (with John Gale).

“Intelsat Restructuring and Comsat’s Non-Dominance: Reply to Dr. Owen and Professor Waverman,” paper filed on behalf of Comsat Corporation with the FCC, *In the Matter of Comsat Corporation Petition for Forbearance from Dominant Carrier Regulation and for Reclassification As a Non-Dominant Carrier*, (“Comsat’s Forbearance Petition”) File No. 60-SAT-ISP-97, March 1998.

“Competition in International Satellite Services: Wither INTELSAT Restructuring?” paper filed on behalf of Comsat with the FCC in Comsat’s Forbearance Petition, November 1997.

“Competitive Concerns with Gaming of the International Settlements Process under Asymmetric Liberalization of International Telecommunications and Above-Cost Settlement Rates,” Affidavit submitted on behalf of AT&T to FCC, in proceedings on *Rules and Policies on Foreign Participation in the U.S. Telecommunications Market*, IB 97-142, November 18, 1997.

“The ‘Open Local Market Standard’ for Authorizing BOC InterLATA Entry: Reply to BOC Criticisms,” Supplemental Affidavit submitted on behalf of U.S. DOJ to FCC, along with DOJ’s evaluation of following BOC application(s): BellSouth in South Carolina, November 4, 1997 and in Louisiana, December 10, 1997. <www.usdoj.gov/atr/statements/1281.htm>

“Competitive Implications of Bell Operating Company Entry into Long-Distance Telecommunications Services,” Affidavit submitted on behalf of U.S. Department of Justice (DOJ) to FCC, along with DOJ’s evaluations of following BOC applications: SBC in Oklahoma, May 16, 1997; Ameritech in Michigan, June 25, 1997; and BellSouth in South Carolina, November 4, 1997 and in Louisiana, December 10, 1997. <www.usdoj.gov/atr/statements/Afffiwp60.htm>

“Towards Competition in International Satellite Services: Rethinking the Role of INTELSAT,” paper distributed at OECD Ad Hoc Meeting of Experts on Competition in Satellite Services, Paris, June 1995 (with Joseph E. Stiglitz and Eric Wolff).

“Competitive Markets in Generation: Economic Theory and Public Policy,” paper presented at conference on “Electric Utility Restructuring: Whither Competition?” organized by International Association for Energy Economics Los Angeles Chapter, and Micronomics Inc., Los Angeles, May 1995.

“Option Values of Deposit Insurance and Market Values of Net Worth: Some Evidence for U.S. Banks,” mimeo, December, 1992 (with Behzad Diba and Chia-Hsiang Guo).

“Do Sunk Costs Discourage or Encourage Collusion?” U.S. Department of Justice, Antitrust Division, EPO Discussion Paper 85-10 (September 1985).

“Signalling Equilibria Based on Sensible Beliefs: Limit Pricing Under Incomplete Information,” U.S. Department of Justice, Antitrust Division, EPO Discussion Paper 84-4 (May 1984) (with Maxim Engers).

OTHER SCHOLARLY ACTIVITIES

Seminars Presented

Bellcore
Bureau of Competition Policy, Industry Canada
California State University, Hayward
Center for Strategic and International Studies
Columbia University
ENSAE, Paris
Georgetown University
George Washington University
U.S. International Trade Commission
Johns Hopkins University
New York University – Economics Department
New York University – Stern School of Business
Pennsylvania State University
Simon Fraser University
Tulane University
University of Alberta
University of British Columbia
University of Calgary
University of California, Davis
University of California, Los Angeles
University of Colorado, Boulder
University of Illinois
University of Maryland
University of Montreal
University of Pennsylvania
University of Toronto
University of Virginia
U.S. Department of Justice
U.S. Federal Communications Commission
U.S. Federal Trade Commission

Conferences: Speaker, Discussant or Panelist

- "The Regulation of Information Platforms," University of Colorado School of Law, Boulder, January 2002
- Phoenix Center Phoenix Center for Advanced Legal & Economic Public Policy Studies, U.S. Telecoms Symposium, Washington DC, July 2001
- Practising Law Institute, "Antitrust and Trade Practices Issues in Cyberspace" New York, March 2001
- 28th Annual Telecommunications Policy Research Conference, Washington DC, September 2000
- Schwab Capital Markets LP, Washington Research Group, "Telecom, Internet and Ecommerce Conference," Washington DC, September 2000
- "Experiences with Telecommunications Deregulation," semi-annual meetings organized by AEI-Brookings Joint Center for Regulatory Studies and Centre for European Policy Studies, Washington DC, April 2000
- "Telecommunications After Bell Entry," Conference at University of Colorado School of Law, Boulder, April 2000
- 48th Annual Antitrust Spring Meeting, American Bar Association Section of Antitrust Law, Washington DC, April 2000
- Telecom-IT Americas '99 Conference, Institute of the Americas, La Jolla, November 1999
- 5th Annual Health Care Antitrust Forum, Northwestern University School of Law, Chicago, October 1999
- "Regulatory Reform in Japan, Mexico, the Netherlands and the United States," OECD, Paris, March 1999
- Federal Communications Bar Association Competition Committee, Symposium, Washington DC, January 1999
- Conference on Current Topics in Merger and Antitrust Enforcement, Charles River Associates, Washington DC, December 1998
- Conference on Anticompetitive Regulation, Robert Schuman Centre of the European University Institute, Florence, September 1999
- 47th Annual Antitrust Spring Meeting, American Bar Association Section of Antitrust Law, Washington DC, April 1999
- 25th Annual Telecommunications Policy Research Conference, Washington DC, September 1997
- Telecommunications seminar series, Canadian Bureau of Competition, Ottawa, September 1997
- Competition Policy Workshop, The World Bank, June 1997
- Economics of Interconnection Forum, Federal Communications Commission, Washington DC, May 1996
- Authors' Symposium on Competition Policy and Intellectual Property Rights, Canadian Bureau of Competition, Aylmer, Quebec, May 1996
- Electric Generation Association, Annual Meetings, West Palm Beach, April 1996
- "Wheeling & Dealing: Opportunities and Challenges in the New Electric Industry," conference sponsored by the Center for Regulatory Studies, Illinois State University and the Institute of Government and Public Affairs, University of Illinois-Urbana, Chicago, April 1996
- "New Social and Economic Approaches to a Multimedia World," OECD Symposium, Tokyo, March 1996
- "Telecommunications and Energy Regulation in Transition Economies," Center for Economic Development, Bratislava, October 1995
- "Electric Utility Restructuring: Whither Competition?" organized by International Association for Energy Economics Los Angeles Chapter, and Micronomics Inc., Los Angeles, May 1995.
- "New Learning on Barriers to Entry in Competition Policy," Canadian Bureau of Competition, Ottawa, March 1995
- Southeastern Economic Theory Meetings, Charlottesville, October 1994
- EARIE Conference, Tel Aviv, September 1993
- Midwest International Economics Meetings, Pittsburgh, October 1992
- Latin American Econometric Society, Mexico City, September 1992
- Conference on Industrial Organization, Carleton University, Ottawa, July 1991
- Workshop on Strategic and Dynamic Aspects of International Trade, SUNY at Stony Brook, July 1991
- AEI Conference on "Innovation, Intellectual Property and World Competition," Washington DC, September 1990
- EARIE Conference, Lisbon, September 1990
- Conference on "International Trade and Technology," Brussels and London, November 1989
- EARIE Conference, Budapest, August 1989
- Conference on Strategy and Market Structure, Dundee University, Dundee, August 1988

- Conference on "Firm Ownership and Competition," Graduate School of Business, Stanford University, June 1987
- EARIE Conference, Berlin, August 1986
- AEA Annual Meetings, Dallas, December 1984

Referee for Professional Journals

American Economic Review
Canadian Journal of Economics
Economica
Economic Journal
European Economic Review
European Journal of Political Economy
International Economic Review
International Journal of Industrial Organization
Journal of Business
Journal of Business Economics
Journal of Economic Dynamics and Control
Journal of Economic Education
Journal of Economic Theory
Journal of Economics and Management Strategy
Journal of Industrial Economics
Journal of International Economics
Journal of Law & Economics
Journal of Political Economy
Managerial and Decision Economics
Quarterly Journal of Economics
Quarterly Review of Economics and Business
RAND Journal of Economics
Review of Industrial Organization
Review of International Economics
Scandinavian Journal of Economics

Outside Evaluator—Research Proposals and Tenure & Promotion Cases

National Science Foundation
 Small Business Administration
 Duke University
 INSEAD
 University of Calgary
 University of Michigan
 University of Virginia

DANIEL R. VINCENT – CURRICULUM VITAE

December, 2002

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CITIZENSHIP: Canadian/U.S. Dual Citizenship

EDUCATION:

Degree	Field	Institution	Year
Ph.D.	Economics	Princeton University	1987
B.A.	Philosophy, Politics, Economics	Merton College, Oxford University	1983
B.A.	History	University of Toronto	1981

DISSERTATION:

Strategic Interaction in Dynamic Trading Games: Three Essays in Non-cooperative Game Theory

Advisor: Hugo Sonnenschein

RESEARCH AREAS:

Microeconomic Theory - Theory of Auctions, Empirical Applications of Auction Theory, Bargaining, Procurement, Industrial Organization.
International Trade.
Mathematical Economics.

ACADEMIC AND PROFESSIONAL EXPERIENCE:

January-August 1999 Visiting Scholar, U.S. Department of Justice, Antitrust Division.

July 1998- Associate Professor, Department of Economics, University of Maryland.

1995-1998 Associate Professor, Department of Economics, University of Western Ontario.

1987-1995 Assistant Professor, J.L. Kellogg Graduate School of Management, Northwestern University.

1992-1993 Visiting Assistant Professor, Division of the Humanities and Social Sciences,
California Institute of Technology.

PUBLICATIONS:

Articles in Refereed Journals:

McAfee, R. Preston., Daniel C. Quan., and Daniel R. Vincent. "How to Set Minimum Acceptable Bids with an Application to Real Estate Auctions." *Journal of Industrial Economics* (forthcoming, 2002).

Vincent, Daniel R., and Motty Perry. "Optimal Timing of Procurement Decisions and Patent Allocations." Department of Economics, University of Western Ontario Research Report 9611 *International Economic Review* (forthcoming, 2002).

McAfee, R. Preston., Wendy Takacs., and Daniel R. Vincent. "Tarrifying Auctions." *Rand Journal*, (Spring, 1999).

Vincent, Daniel R. "Repeated Signalling Games and Dynamic Trading Relationships," *International Economic Review* (1998).

McAfee, R. Preston., and Daniel R. Vincent. "Sequentially Optimal Auctions." *Games and Economic Behavior* 18, 2 (1997): 246-276.

Manelli, Alejandro M., and Daniel R. Vincent. "Optimal Procurement Mechanisms." *Econometrica* 63, 3 (1995): 591-620.

Vincent, Daniel R. "Bidding off the Wall: Why Reserve Prices May Be Kept Secret." *Journal of Economic Theory* 65, 2 (1995): 575-584.

McAfee, R. Preston., Daniel Vincent., Michael A. Williams., and Melanie Williams Havens., "Collusive Bidding in Hostile Takeovers." *Journal of Economics and Management Strategy* 2, 4 (1993): 449-482.

McAfee, R. Preston., and Daniel Vincent. "The Declining Price Anomaly." *Journal of Economic Theory* 60, 1 (1993): 191-212.

Vincent, Daniel R. "Modelling Competitive Behavior." *Rand Journal of Economics* 23, 4 (1992): 590-599.

Fershtman, Chaim., Zvi Safra., and Daniel Vincent. "Delayed Agreements and Nonexpected Utility." *Games and Economic Behavior* 3, 4 (1991): 423-437.

Vincent, Daniel R. "Dynamic Auctions." *Review of Economic Studies*, 57, 1 (1990): 49-61.

Vincent, Daniel R. "Bargaining With Common Values." *Journal of Economic Theory* 48, 1 (1989): 47-62.

Non-Refereed Article in Papers and Proceedings Issue of Refereed Journal:

McAfee, R. Preston., and Daniel Vincent, "Updating the Reserve Price in Common-Value Auctions." *American Economic Review Papers and Proceedings* 82, 2 (1992): 512-518.

Contributed Papers:

Segal, U. and Daniel R. Vincent. "Punishment Schedules for Capital Flight", *The World Economy*, Vol.. 21, no. 5. (1998): 629-638.

Book Review in Refereed Journal:

Vincent, Daniel R. "Review of *A Theory of Moves* by Steven J. Brams." In *Journal of Economic Literature* 33, 2 (1995): 823-824.

Non-Refereed Published Commentaries:

Vincent, Daniel R. "Revenue Equivalence, the Winner's Curse and Aftermarket Sales in Auctions." *Proceedings of Spectrum 20/20*. The Radio Advisory Bureau, Ottawa, November 1996.

Vincent, Daniel R. "Comments on 'Review of the Comparative Selection and Radio Licensing Process--Findings'." [Prepared as an Appendix to: Mobility Canada, "Policy Discussion Respecting: 'Review of the Comparative Selection and Radio Licensing Process--Findings'." June 30, 1996.

Vincent, Daniel R. "Industry Canada is Taking Itself to the Cleaners." *The Globe and Mail*, December 7, 1995.

UNPUBLISHED WORK:

Manuscripts at Submission Stage:

Schwartz, Marius, and Daniel R. Vincent. "Same Price, Cash or Credit: Vertical Control in Electronic Payments Networks", mimeo, November, 2001.

Vincent, Daniel R. and Alejandro Manelli. "Bundling as an Optimal Selling Mechanisms for a Multiple-Good Monopolist".

Working Papers and Mimeos:

Manelli, Alejandro., and Daniel R. Vincent. "Mecanismos Optimos de Adjudicacion de Contratos Publicos: La adquisicion de material de telecomunicaciones y la venta del espectro de frecuencias de radio." FEDEA Madrid, DT 95-19 (October 1995).

Kamien, Morton., and Daniel R. Vincent. "Price Regulation and Quality of Service." CMSEMS DP. No. 920 (February 1991).

Vincent, Daniel R. "Principals and Partners: The Structure of Syndicates." CMSEMS DP No. 909 (January 1991).

Work in Progress:

Vincent, Daniel R., and R. Preston McAfee. "A Simple Test of the IPV-CV Hypothesis."

Vincent, Daniel R., and Ignatius Horstmann. "A Model of Multi-Nationals."

Vincent, Daniel R. and Alejandro Manelli. "Information Revelation Policies for Sellers at Auction."

Vincent, Daniel R. and Alejandro Manelli. "Optimal Trading Mechanisms for Sellers with Many Goods: When Standing Firm is Optimal: Why Standing Firm is So Rarely Optimal".

UNIVERSITY ADMINISTRATIVE DUTIES:

Member, Executive Committee, University of Maryland, 2000-2002

Member, Junior Recruiting Committee, University of Maryland, 1999-2002.

Member, Ad Hoc Committee on Senior Recruitment, University of Maryland, 1998-99.

Member, Appointments Committee, University of Western Ontario, 1996-1997, 1997-1998.

Workshop Director, Department Colloquium Visiting Speaker Series, 1997-1998.

Workshop Director, International Trade Visiting Speaker Series, 1997-1998.

Co-organizer and Host of the Northwestern University Summer Workshop in Microeconomics, "Topics in Industrial Organization," 1994.

Organizer of the Math Center Visiting Speaker Seminar Series, Northwestern University, 1989-90, 1990-91.

P.H.D. THESIS COMMITTEES:

Gail Cohen, Managerial Economics and Decision Sciences, J. L. Kellogg Graduate School, Northwestern University, 1992.

Topic: Essays in Industrial Organization.

Currently at Federal Energy Commission, Washington, DC.

Brian Rivard, Department of Economics, University of Western Ontario, 1996.

Topic: An Imperfect Competition Suite.

Currently at the Competition Bureau, Industry Canada, Ottawa.

Benoit Julien, Department of Economics, University of Western Ontario, 1996.

Topic: Essays on Auctions and Contracts

Currently on Faculty at Department of Economics, University of Miami.

Soamiely Andriamananjara, Department of Economics, University of Maryland, 1999.

Topic: Regionalism and Its Effects on Multilateralism

Currently at the International Trade Commission.

Jesse Schwartz, Department of Economics, University of Maryland, 1999.

Topic: Demand Reduction in Multiple Unit Ascending Auctions

Currently on Faculty at Department of Economics, Vanderbilt University.

Gary Anderson, Department of Economics, University of Maryland, 1999.
 Topic: Multinational Corporations and Developing Countries
 Currently on Faculty at ITAM, Mexico City, Mexico.

Gwen Alexander, Department of Economics, University of Maryland, 2000.
 Topic: Essays in MicroFinance.

Jeff Lien, Department of Economics, University of Maryland, 2000.
 Topic: The Strategic Use of Forward Contracts: Applications to Power Markets.
 Currently at the U.S. Department of Justice, Antitrust Division.

Haiwen Zhou, Department of Economics, University of Maryland, 2002.
 Topic: Three Essays on Industrial Organization.
 Currently at the Old Dominion University.

CONSULTING:

Principal, Market Design Incorporated (MDI), Stanford, CA.

Consultant for an auction client (through NERA), 2002.

Consultant for the National Association of Station Affiliates, (with Marius Schwartz), 2002.

Consultant for the U.S. Department of Justice, Antitrust Division – Various antitrust matters – September, 1999–2000, 2001.

Consultant for Industry Canada. Review of auction rules for PCS auctions. (Joint with MDI/CRA), June, 2000.

Consultant for a participant in the Alberta, PPA auctions, Spring, 2000--

Consultant for OFCOM, Switzerland. Design of auction for UMTS 3G services. Spring, 2000 --

Consultant for a participant in U.K. UMTS 3G spectrum auctions, January-March, 2000.

Consultant for a participant in Industry Canada, 24-38MHZ spectrum auctions, November, 1999.

Consultant for the Federal Communications Commission. Modification of Auction Rules for Combinatorial Bidding. (Joint with MDI/CRA). 1997-1998.

Consultant for the Federal Communications Commission--Assessment of U.S. Spectrum Auctions and Auctions Adviser--1997.

Consultant for Industry Canada, "Assessment of the Market Value of Cellular Telephones, Personal Communication Services and Enhanced Specialized Mobile Radio License Fees," 1996-1997.

Consultant for TELUS on Industry Canada's proposal for a revision of the radio frequency licensing process.

Consultant for Ameritech, Chicago, IL (D and E Block BTA Auctions, 1995.)

Consultant on 1994 FCC Spectrum Auction Design for American Personal Communications, Washington, D.C. (Auction design phase).

Consultant on Tariff-Quota Equivalents and Auction Data for the World Bank, 1992 to 1994.

Consultant on Procurement Methods for the Bank of Spain, 1994.

PROFESSIONAL SERVICE:

Associate Editor, *Journal of Economic Theory*, Summer 1996- .

Member, Editorial Board, *American Economic Review*, 2000 -

Invited Lecturer, World Bank, Transparency in Infrastructure, March, November, 2002.

Invited Lecturer, Harvard Institute for International Development, Privatization Project, July, 2000.

REFEREEING:

(i) Journals

American Economic Review

Econometrica

Economic Design

Economic Inquiry

Economic Theory

Games and Economic Behavior

Journal of Economics and Management Strategy

Journal of Economics and Statistics

Journal of Economic Theory

Journal of Industrial Economics

Journal of Law, Economics and Organization

Journal of Public Economics

Quarterly Journal of Economics

Rand Journal of Economics

Review of Economic Studies

(ii) Research Organizations

National Science Foundation

Social Sciences and Humanities Research Council of Canada

RESEARCH GRANTS:

2001-2003 National Science Foundation Grant # 0095729

1996-1999 "Auction Theory and Empirical Applications" \$50,000
SSHRC

Recent Conferences:

Summer Meetings of the Econometric Society, College Park, MD, June 2001.

Midwest Mathematical Economics Conference, State College, PA, October, 2001.

IDEI Conference on the Economics of Payments Systems, Toulouse, France, June 2002.

FCC Conference on Combinatorial Bidding Systems, Wye River, MD, October, 2001.

ATTACHMENT 2

AFFILIATE STATION GENERAL MANAGERS: WE NEED YOUR HELP



In connection with the current FCC proceeding considering changes to the 35 percent cap station ownership rule, NASA and NAB are collecting information on the preemption practices of network affiliated television stations. Please complete this survey and return it by fax to 202-721-8799 or 202-775-2980 no later than **Friday, December 6, 2002**. With the exception of specific examples of program preemptions—some of which may be provided to the Commission as illustrations (see Question 5)—individual responses will be kept *strictly confidential*, and survey results will be shared only in aggregate form. If you have any questions, please contact NAB Research & Planning at (202) 429-5381. Thank you!

Note: While the term "*preemption*" is defined in a variety of ways in various affiliate agreements, for the purpose of this survey, please define it as *any instance in which your station has chosen to air content of its own choosing instead of content offered by a network*.

1. Does your station maintain historical records on your preemption activity? ☐ Yes ☐ No

If Yes:

1a. Approximately how far back do these records date? Year: _____

2. For which of the following types of reasons have you preempted network programming in the past?
(check all that apply)

- | | |
|---|---|
| <input type="checkbox"/> Local political activity (debates, etc.) | <input type="checkbox"/> National breaking news events |
| <input type="checkbox"/> Local sports | <input type="checkbox"/> Religious programming |
| <input type="checkbox"/> Local emergencies | <input type="checkbox"/> Unsuitability of network programming |
| <input type="checkbox"/> Local news or public affairs programming | <input type="checkbox"/> Other public affairs programming |
| <input type="checkbox"/> Local breaking news events | <input type="checkbox"/> Other locally produced programming |
| <input type="checkbox"/> Other (please list): _____ | |

2a. If you maintain historical records of your preemption activity, do these records specify the reason for the preemption?

☐ Yes ☐ No

3. Have the most common reasons for preempting (or not preempting) changed in recent years? ☐ Yes ☐ No

If Yes:

3a. What reasons for preemptions have become more common? _____

3b. What reasons for not preempting programs have become more common? _____

**Please fax your completed survey form to (202) 721-8799 or (202) 775-2980
no later than Friday, December 6, 2002. Thank You!**

4. For each of the following years, how many hours per year did you preempt network programming?
(please also check the appropriate box to indicate how you arrived at this figure)

/-----Based On: -----/

<u>Year</u>	<u>Total Hours Preempted</u>	<u>Records</u>	<u>Estimate</u>	<u>Combination of Records & Est.</u>
2001	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2000	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1999	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1998	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1997	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1996	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1995	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1994	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1993	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1992	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1991	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

5. Please provide five examples where you have preempted network programming and aired other content in order to better serve the tastes and needs of your local community (if multiple broadcasts or an entire season of a program were preempted, please indicate this):

<u>Date</u>	<u>Time</u>	<u>Preempted Program:</u>	<u>Program Aired:</u>
A. _____	_____	_____	_____
Reason: _____			

<u>Date</u>	<u>Time</u>	<u>Preempted Program:</u>	<u>Program Aired:</u>
B. _____	_____	_____	_____
Reason: _____			

<u>Date</u>	<u>Time</u>	<u>Preempted Program:</u>	<u>Program Aired:</u>
C. _____	_____	_____	_____
Reason: _____			

**Please fax your completed survey form to (202) 721-8799 or (202) 775-2980
no later than Friday, December 6, 2002. Thank You!**

<u>Date</u>	<u>Time</u>	<u>Preempted Program:</u>	<u>Program Aired:</u>
D. _____	_____	_____	_____
Reason: _____			

E. _____	_____	_____	_____
Reason: _____			

6. Have you experienced pressure from your network to not preempt programming? ☐ Yes ☐ No

If yes:

6a. In recent years, has this pressure increased, decreased, or not changed?

☐ Increased ☐ Decreased ☐ No Change

7. Have you observed a difference (in your market or elsewhere) in the preemption practices of network owned and operated stations versus those of other affiliated stations?

☐ Yes ☐ No

If yes:

7a. How are the preemption practices different?

7b. What is the basis for your observation?

8. Have you previously worked for an O&O station? ☐ Yes ☐ No

If yes, please complete the following page. If no, please fill in the information below and fax your completed survey to 202-721-8799 or 202-775-2980 now.

Name: _____

Email: _____

Title: _____

Phone: _____

Station: _____

Fax: _____

Please fax your completed survey form to (202) 721-8799 or (202) 775-2980 no later than Friday, December 6, 2002. Thank You!

Questions for Former Employees of Owned & Operated Stations

For purposes of comparison, we would like to collect additional information on the preemption practices of owned and operated stations. Please complete the following questions only if you have previously worked for an O&O.

1. In your experience, which station preempts more frequently, the O&O station for which you worked or your current station?

- ☐ The O&O station preempted more frequently
☐ My station preempts more frequently

2. In your experience, which station's managers have more flexibility in making preemption decisions, the O&O station managers or your current station's managers?

- ☐ The O&O station's managers had more flexibility
☐ My station's managers have more flexibility

3. What is the network affiliation of the O&O station for which you worked? _____

4. Please use the space below to describe any notable preemption stories from your service at the O&O station (include additional pages if necessary):

[illegible]

***Please fax your completed survey form to (202) 721-8799 or (202) 775-2980
no later than Friday, December 6, 2002. Thank You!***

Methodology

On November 21, 2002, a survey questionnaire was sent to General Managers of all ABC, CBS, and NBC affiliated stations (surveys were not sent to network owned and operated stations) in those markets where all three of these networks have an affiliate or owned and operated television station on air. The survey did not include satellite stations. There were no other selection criteria—e.g., stations of all market sizes were included in the survey.

Stations in those markets in which any of the three networks did not have an affiliate or owned and operated station were excluded because such situations could result in atypical preemption patterns because of possible dual network affiliations. In all, the survey was sent to 422 stations.¹

A total of 201 usable responses were received in time for inclusion in the tabulated data, which represented a response rate of 47.6 percent. Because this was an attempted census of all stations that met the criteria for inclusion in this study, rather than a randomly selected sample of eligible stations, there is no sampling error estimate to report.

¹ The survey was sent by facsimile. NAB/NASA was not able to send the survey to one station because of an inoperable facsimile number.

Station Call Sign: KAQY

Affiliation:

ABC

A	Date: 02/10	Show Preempted: Monk
	Time: 7 pm	Show Aired: Political Debate
	Reason: Hotly contested race/to inform public of issues	

B	Date: 01/04	Show Preempted: Sam Donaldson/Sports
	Time: 8 am	Show Aired: Telethon CP
	Reason: Raise money for La. Cerebral Palsy	

C	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KAKE

Affiliation:

ABC

A	Date: 98/04/12	Show Preempted: ABC Sports
	Time: 1 pm	Show Aired: Kansas City Royals
	Reason: "Hometown" baseball team	

B	Date: 98/06/03	Show Preempted: ABC Movie
	Time: 8 pm	Show Aired: Children's Miracle Network Telethon
	Reason:	

C	Date: 00/04/23	Show Preempted: NHL Game
	Time: 1 pm	Show Aired: Literacy Telethon
	Reason: Locally produced/long term association with Literacy Society	

D	Date: 01/07/04	Show Preempted: ABC Special
	Time: 9 pm	Show Aired: Celebrate 2001
	Reason: Live local news special	

E	Date: 02/03/04	Show Preempted: Whose Line
	Time: 7 pm	Show Aired: KAKE Weather special
	Reason: Prepare for severe weather season	

Station Call Sign: KAMC

Affiliation:

ABC

A	Date: 00/08/25 Time: 7 pm	Show Preempted: ABC Primetime Pgms Show Aired: Texas Boys Ranch telethon
	Reason: To raise operating funds for the ranch	

B	Date: 00/01/08 Time: 7 pm	Show Preempted: ABC Primetime Pgms Show Aired: WT Rehab telethon
	Reason: To raise funds for WT Rehab Center, Abilene, TX	

C	Date: 00/05/11 Time: 9 pm	Show Preempted: 20/20 Downtown Show Aired: Lubbock's 1970 Tornado
	Reason: Documentary on the anniversary of the 1970 Lubbock Tornado	

D	Date: 02/10/24 Time: 7 pm	Show Preempted: ABC News Special Show Aired: Texas Gubernatorial debate
	Reason: Public service	

E	Date: 02/10/09 Time: 10:35 pm	Show Preempted: Nightline and Up Close Show Aired: TX Gubernatorial debate
	Reason: Public service	

Station Call Sign: KAMR

Affiliation:

NBC

A	Date: Time:	Show Preempted: Show Aired:
	Reason:	

B	Date: Time:	Show Preempted: Show Aired:
	Reason:	

C	Date: Time:	Show Preempted: Show Aired:
	Reason:	

D	Date: Time:	Show Preempted: Show Aired:
	Reason:	

E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: KAPP

Affiliation:

ABC

A	Date: 2000-2002	Show Preempted: ABC World News Morning
	Time: 5 am	Show Aired: Morning Local News
	Reason: Add local news to the a.m.	
B	Date: Sept.	Show Preempted: Daytime
	Time: 7 am	Show Aired: MDA Telethon
	Reason:	
C	Date: June	Show Preempted: Wknd sports primetime
	Time: 5 am	Show Aired: CMN Telethon
	Reason:	
D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	
E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KARE

Affiliation:

NBC

A	Date: 01/09/15	Show Preempted: NBC Movie: Gorwing Up Brady
	Time: 9 pm	Show Aired: 11 Who KARE
	Reason: The yearly program recognizes outstanding volunteers in the viewing area which is of interest to this community	
B	Date: 99/08/18	Show Preempted: World's Most Amazing Videos
	Time: 8 pm	Show Aired: Extra Extra: A Child's Voice
	Reason: Quarterly local program featuring unique and outstanding people and issues in our community	
C	Date: 98/06/15	Show Preempted: Dateline
	Time: 9 pm	Show Aired: Beyond the Lens
	Reason: Recognizing KARE 11's photographers' outstanding achievement winning the NPPA.	
D	Date: 00/01/08	Show Preempted: Freaks & Geeks/Pretender
	Time: 7 pm	Show Aired: Mn. Timberwolves vs. Detroit
	Reason: Partnership with local NBA team to bring otherwise untelevised games to our viewing area.	
E	Date: 97/03/21	Show Preempted: Unsolved Mysteries
	Time: 7 pm	Show Aired: Simply Science: Underwater World
	Reason: Educational and scientific local program airing quarterly.	

Station Call Sign: KATU

Affiliation:

ABC

A	Date: 01/02/02	Show Preempted: Two Guys & A Girl; Norm
	Time: 8 pm	Show Aired: The Body Female: Body Image Trap
	Reason: Local women's health series	

B	Date: 01/03/06	Show Preempted: Dharma & Greg; Geena Davis
	Time: 9 pm	Show Aired: Power Drain: NW Energy Crisis
	Reason:	

C	Date: 01/04/06	Show Preempted: Two Guys & a Girl; Norm
	Time: 8 pm	Show Aired: The Body Female: Good News About Breast Cancer
	Reason:	

D	Date: 02/06/02	Show Preempted: All net prime
	Time: 8 pm	Show Aired: Children's Miracle Network Telethon
	Reason: Benefiting local children's hosp.	

E	Date: 02/06/18	Show Preempted: 20/20
	Time: 8 pm	Show Aired: The Body Female: Having Babies
	Reason:	

Station Call Sign: KBCI

Affiliation:

CBS

A	Date: 02/11/20	Show Preempted: Victoria's Secret
	Time: 8 pm	Show Aired: St. Jude Research Hosp.
	Reason: Did not meet community standards for family viewing hour	

B	Date: 02/11/23	Show Preempted: CBS NCAA
	Time: 1 pm	Show Aired: Boise State football
	Reason: Local team	

C	Date: 02/11/02	Show Preempted: CBS Prime
	Time: 7 pm	Show Aired: Boise State Football
	Reason: Local team	

D	Date: 02/10/26	Show Preempted: CBS NCAA
	Time: 3 pm	Show Aired: Boise State Football
	Reason: Local team	

E	Date: 02/10/12	Show Preempted: CBS Prime/CBS News
	Time: 5 pm	Show Aired: Boise State Football
	Reason: Local team	

Station Call Sign: KCCI

Affiliation:

CBS

A	Date: 00/06/03 Time: 8 pm	Show Preempted: Survivor/Walker Texas Ranger Show Aired: Children's Miracle Network telethon
	Reason: Fundraising telethon for local children's hospital	
B	Date: 99/02/03 Time: 7 pm	Show Preempted: The Nanny/Maggie Winters Show Aired: Iowa's War on Meth
	Reason: Local 'Town Meeting' news special on drug abuse	
C	Date: 98/12/26 Time: 7 pm	Show Preempted: Early Edition Show Aired: Iowa Lottery Special
	Reason: Special state lottery contest (paid program)	
D	Date: 97/10/23 Time: 7 pm	Show Preempted: Promised Land Show Aired: Des Moines Mayoral Forum
	Reason: Local political debate	
E	Date: 97/04/16 Time: 7 pm	Show Preempted: The Nanny Show Aired: Rumor Risk & Reality: Teenage Substance Abuse
	Reason: Statewide substance abuse special, produced by Iowa Broadcasters Assn.	

Station Call Sign: KCEN

Affiliation:

NBC

A	Date: 00/03 Time: 7:30 pm	Show Preempted: God, the Devil & Bob Show Aired: U.S. Olympic Gold
	Reason: Content of network program	
B	Date: 00/06/03 Time: 7 pm	Show Preempted: NBC Movie Show Aired: Coors Rodeo Finals
	Reason: Local sports interest	
C	Date: 01/06/02 Time: 5 pm	Show Preempted: NBC Movie & Prime Show Aired: Children's Miracle Telethon
	Reason: Annual/local fundraiser for hospital	
D	Date: 01/12/04 Time: 7 pm	Show Preempted: NBC Style Celebrities Show Aired: Billy Graham
	Reason: Sales revenue of Xmas special	
E	Date: 02/10/23 Time: 7 pm	Show Preempted: Extreme Variety Show Aired: Political debate
	Reason: Local interest/Texas Senate candidates	

Station Call Sign: KNVN

Affiliation:

NBC

A	Date:	Show Preempted: Net
	Time: am/pm	Show Aired: Wildfire coverage
	Reason:	

B	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

C	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KCTV

Affiliation:

CBS

A	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

B	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

C	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KDBC

Affiliation: CBS

A	Date: N/A Time: 7 or 8 pm	Show Preempted: TBA Show Aired: ??
	Reason: KDBC only preempts network for paid religious and network breaking news or local breaking news/weather. We work with the network as to what programs will be preempt.	

B	Date: 98/99 Time:	Show Preempted: n/a Show Aired: n/a
	Reason: Pre-empt for University of TX El Paso Basketball	

C	Date: Dec. annual Time: Afternoon	Show Preempted: CBS Sports Show Aired: Operation Noel
	Reason: 2-4 hour local Telethon to raise money for children in the El Paso, Las Cruces/Juarez area. Money collected provides coats/outerwear to underprivileged Children	

D	Date: Time:	Show Preempted: Show Aired:
	Reason:	

E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: KDLT

Affiliation: NBC

A	Date: 1996 Time: 7 pm	Show Preempted: ? Show Aired: Senate debate
	Reason:	

B	Date: 2001 Time: 7:30 pm	Show Preempted: ? Show Aired: Weather special
	Reason:	

C	Date: Time:	Show Preempted: Show Aired:
	Reason:	

D	Date: Time:	Show Preempted: Show Aired:
	Reason:	

E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: KDRV

Affiliation:

ABC

A	Date: 02/02/02	Show Preempted: ABC Sports
	Time: 3 pm	Show Aired: O.S.N. Basketball
	Reason: Contractual sports programming	
B	Date: 02/09/14	Show Preempted: ABC Sports
	Time: 12:30 pm	Show Aired: O.S.N. Football
	Reason: Contractual sports programming	
C	Date: 02/10/20	Show Preempted: ABC World News Sunday
	Time: 6 pm	Show Aired: On the Line
	Reason: To air local news special regarding local bond issues	
D	Date: 02/11/17	Show Preempted: ABC World News Tonight Sunday
	Time: 6:30 pm	Show Aired: Sentries in the Sinai
	Reason: Special on local guardsmen serving in the Middle East	
E	Date: 02/11/29	Show Preempted: ABC World News Tonight
	Time: 5:30 pm	Show Aired: Oregon Century w/Ron Brown
	Reason: Local stories of interest for the holiday	

Station Call Sign: KECI

Affiliation:

NBC

A	Date: 02/12/01	Show Preempted: NBC Sportsworld & NBC Golf
	Time: 12 noon	Show Aired: NCAA Football Playoffs: NW St. vs. U. Montana
	Reason: Local football team was playing in college football playoffs so this game was of huge local interest & significance.	
B	Date: 02/10/05	Show Preempted: Notre Dame Football
	Time: 1 pm	Show Aired: College Football: UM @ Idaho
	Reason: Local college team that won last year's nat'l championship in Division I-AA. Huge local interest in their games this season.	
C	Date: 02/10/19	Show Preempted: NASCAR & NBC Golf
	Time: 1 pm	Show Aired: College Football: So. Utah @ UM
	Reason: Same as above	
D	Date: 02/11/02	Show Preempted: Notre Dame Football
	Time: 12 noon	Show Aired: College Football: No. Ariz. @ UM
	Reason: Same as above	
E	Date: 02/11/30	Show Preempted: NBC Sat. Movie
	Time: 6 pm	Show Aired: College Football: NCAA Playoff MT St. @ McNeese St
	Reason: Another Montana college football team competing in nat'l playoffs. Huge local interest. (College is in our DMA.)	

Station Call Sign: KFDM

Affiliation:

CBS

A	Date: 02/01/11 Time: 7 pm	Show Preempted: Everybody Loves Raymond/Ellen DeGeneres Show Aired: St. Jude
	Reason: To promote medical research	

B	Date: 02/03/08 Time: 7 pm	Show Preempted: JAG Show Aired: Billy Graham
	Reason: Dr. Graham is extremely popular in this area	

C	Date: 02/10/09 Time: 7 pm	Show Preempted: 60 Minutes II Show Aired: TX Gubernatorial debate
	Reason:	

D	Date: 02/12/21 Time: 7 pm	Show Preempted: Touched by an Angel/The District Show Aired: Lamar Basketball game
	Reason: Effort to promote and support local university	

E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: KFOR

Affiliation:

NBC

A	Date: 01/06/11 Time: 9 pm	Show Preempted: Third Watch Show Aired: Tapestry
	Reason:	

B	Date: 01/08/07 Time: 8:30 pm	Show Preempted: Three Sisters Show Aired: Great State Anniv. Spec.
	Reason:	

C	Date: 00/04/07 Time: 7 pm	Show Preempted: Providence Show Aired: May's Fury
	Reason: Historical footage of May 3rd tornado devastation	

D	Date: 99/06/02 Time: 8 pm	Show Preempted: World's Most Amazing Videos Show Aired: Remember When
	Reason: Station celebrating 50 yrs. on air.	

E	Date: 99/06/11 Time: 7 pm	Show Preempted: Dateline NBC Show Aired: May's Fury
	Reason: Historical footage of May 3rd tornado devastation	

Station Call Sign: KGET

Affiliation:

NBC

A	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

B	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

C	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KGUN

Affiliation:

ABC

A	Date: 02/11/05	Show Preempted: ABC Prime
	Time: 8:30 pm	Show Aired: Local election coverage
	Reason: Local election coverage	

B	Date: 02/09/01	Show Preempted: Prime, AM & Daytime
	Time: 6 pm	Show Aired: MDA Telethon
	Reason: Televised MDA telethon for 34 years	

C	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KGW

Affiliation:

NBC

A	Date: 02/11/05 Time: 8 pm	Show Preempted: Fear Factor, Frasier Show Aired: Election coverage
	Reason: Continuous coverage of key local & national races. (Aired Dateline in special time period of 7-8 pm.)	
B	Date: 02/11/03 Time: 6 pm	Show Preempted: Dateline/American Dreams/part of Law & Order Show Aired: Portland Trail Blazers Basketball
	Reason: We carry 31 Blazer games throughout the season placed in various dates and times.	
C	Date: 02/08/25 Time: 7 pm	Show Preempted: Dateline Show Aired: Breaking local news
	Reason: Breaking news in search for accused killer of 2 local girls	
D	Date: 02/07/04 Time: 9:30 pm	Show Preempted: Last part of Macy's Fireworks/Dateline July 4 Special Show Aired: Ft. Vancouver Fireworks Spectacular
	Reason: Live coverage of largest fireworks west of Mississippi in Vancouver WA in our metro viewing area. This is the 7th year we've carried the telecast. Have another 3 yrs confirmed.	
E	Date: 02/06/01 Time: 9 pm	Show Preempted: NBC Movie: The 60s Show Aired: Starlight Parade
	Reason: Live coverage of the illuminated parade that kicks off the 3-week long Portland Rose Festival. This was the 4th continuous year we've broadcast the event.	

Station Call Sign: KHAS

Affiliation:

NBC

A	Date: 02/06/01 Time: 5:30 pm	Show Preempted: Nightly News Show Aired: CMN Telethon
	Reason: Omaha Children's Hospital	
B	Date: 02/06/01 Time: 7 pm	Show Preempted: Primetime Show Aired: CMN Telethon
	Reason:	
C	Date: 01/06/02 Time: 7 pm	Show Preempted: Primetime Show Aired: CMN Telethon
	Reason:	
D	Date: 01/06/02 Time: 10:30 pm	Show Preempted: Saturday Night Live Show Aired: CMN Telethon
	Reason:	
E	Date: 01/06/03 Time: 7 am	Show Preempted: Sunday Today Show Aired: CMN Telethon
	Reason:	

Station Call Sign: KHBS

Affiliation:

ABC

A	Date: Fall '01 Time: 11:30 am	Show Preempted: ABC Sports Show Aired: SEC Football
	Reason: KHBS/KHOG aired the syndicated SEC football (12 games) September through November.	
B	Date: Winter '01 Time: Various	Show Preempted: ABC Sports Show Aired: SEC Basketball
	Reason: KHBS/KHOG aired 27 SEC Basketball games (2 hrs. each) January-March	
C	Date: 00/11/07 Time: 9 pm	Show Preempted: ABC PrimeTime Show Aired: Local Election results
	Reason: Preempted for local election results	
D	Date: Various Time: Various	Show Preempted: ABC Primetime Show Aired: Local weather alerts
	Reason: Weather and severe alerts are important to our viewers. We air local superdoppler weather alerts when needed.	
E	Date: Various Time: Various	Show Preempted: ABC Prime/Daytime Show Aired: News Special reports
	Reason: KHBS/KHOG Preempts ABC and syndicated programming for local news special reports.	

Station Call Sign: KHGI

Affiliation:

ABC

A	Date: Various Time: 6 pm	Show Preempted: Network Special Coverage Show Aired: Local News!
	Reason: Our obligation is to provide local news to our viewers when they expect and need it!	
B	Date: 02/09/11 Time: 6 am	Show Preempted: Network coverage Show Aired: Local news
	Reason: See above	
C	Date: Time:	Show Preempted: Show Aired:
	Reason:	
D	Date: Time:	Show Preempted: Show Aired:
	Reason:	
E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: KHOU

Affiliation:

CBS

A	Date: 02/10/09 Time: 7 pm	Show Preempted: 60 Minutes II Show Aired: Political debate
	Reason:	
B	Date: 02/10/18 Time: 7 pm	Show Preempted: 48 Hours Show Aired: News Special
	Reason:	
C	Date: 02/04/09 Time: 9 pm	Show Preempted: 48 Hours Show Aired: Family Issues News Special
	Reason:	
D	Date: 01/06/09 Time: Continuous	Show Preempted: All network Show Aired: Breaking News (Flooding)
	Reason:	
E	Date: 02/06/14 Time: 9 pm	Show Preempted: 48 Hours Show Aired: Project TX State of Pollution
	Reason:	

Station Call Sign: KHQ

Affiliation:

NBC

A	Date: 02/03/02 Time: 8 pm	Show Preempted: Saturday Movie Show Aired: State B Basketball tournament
	Reason: Huge local interest in high school small school basketball tournament played locally in Spokane, KHQ currently in the 3rd year of 5 year contract.	
B	Date: 02/05/05 Time: 9 am	Show Preempted: NBA Playoffs Show Aired: Bloomsday
	Reason: This preemption was for the last 30 minutes of a 2 1/2 hour telecast of Bloomsday Road Race, an annual Spokane event w/more than 50,000 participants.	
C	Date: 02/12/03 Time: 10 pm	Show Preempted: Dateline Show Aired: Billy Graham
	Reason: Provide religious based programming	
D	Date: 02/12/28 Time: 2:30 pm	Show Preempted: Golf Show Aired: Gonzaga Basketball
	Reason: Local interest in local college team; contract to televise games.	
E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: KIII

Affiliation:

ABC

A	Date: 02/11/04 Time: 7:30 pm	Show Preempted: Drew Carey Show Aired: News
	Reason: Weather disaster	

B	Date: 02/04 Time: 7 pm	Show Preempted: Network Show Aired: Debate
	Reason: Political debate	

C	Date: Time:	Show Preempted: Show Aired:
	Reason:	

D	Date: Time:	Show Preempted: Show Aired:
	Reason:	

E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: KIMA

Affiliation:

CBS

A	Date: 02/11/20 Time: 9 pm	Show Preempted: Victoria's Secret Fashion Show Show Aired: St. Jude's Hospital
	Reason: Mature content scheduled too early considering younger viewers available at 9:00 pm.	

B	Date: 01/08/08 Time: 8 pm	Show Preempted: 60 Minutes II Show Aired: Women and Heart Disease
	Reason: Group produced women's health special	

C	Date: 01/08/18 Time: 10 pm	Show Preempted: The District Show Aired: Women and Body Image
	Reason: Group produced women's health special	

D	Date: 01/08/23 Time: 10 pm	Show Preempted: CSI Show Aired: Good News About Breast Cancer
	Reason: Group produced women's health special	

E	Date: 01/08/29 Time: 8 pm	Show Preempted: Big Brother Show Aired: Women and Hormones
	Reason: Group produced women's health special	

Station Call Sign: KIRO

Affiliation:

CBS

A	Date: 01/09/17 Time: 10 pm	Show Preempted: Ray/Becker Show Aired: KIRO News Special: A Time for Recovery
	Reason: Local response to 9/11 tragedy	
B	Date: 02/05/24 Time: 10 pm	Show Preempted: 48 Hours Show Aired: KIRO News Special: Farewell Harry
	Reason: Tribute to retiring weathercaster Harry Wappler	
C	Date: 02/09/27 Time: 6:30 pm	Show Preempted: District, The Agency Show Aired: Seafair Torchlight Parade
	Reason: Local community parade in celebration of annual event	
D	Date: 02/12/06 Time: 8 pm	Show Preempted: 48 Hours Investigates Show Aired: KIRO News Special: War of the Woods
	Reason: Timber industry / environmental controversy	
E	Date: 02/12/20 Time: 10 pm	Show Preempted: Robbery Homicide Division Show Aired: KIRO News Special: Springer: An Orca's Journey Home
	Reason: Local orphan whale--local interest	

Station Call Sign: KITV

Affiliation:

ABC

A	Date: 97/06/19 Time: 7 pm	Show Preempted: High Incident Show Aired: Real Kids
	Reason: Gave camera to kids to record a day in their lives and edited results to one hour special	
B	Date: 98/04/11 Time: 9 pm	Show Preempted: ABC Movie Show Aired: Na Kumu Hula
	Reason: Cultural program about Hawaii's Hula teachers and traditions	
C	Date: 99/05/07 Time: 8 pm	Show Preempted: Sabrina/Brothers Keeper Show Aired: Bishop Estate News Special
	Reason: Breaking news on continuing huge story in Hawaii	
D	Date: 00/09/14 Time: 7 pm	Show Preempted: Whose Line Show Aired: Mayors debate
	Reason: Mayors debate--public service	
E	Date: 01/04/19-21 Time: 7 pm	Show Preempted: All ABC Prime Show Aired: Mercia Monarch Hula Festival
	Reason: Each year KITV airs Hawaii's most important cultural event live from Hilo for 3 nights	

Station Call Sign: KIVI

Affiliation:

ABC

A	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

B	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

C	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KBTv

Affiliation:

NBC

A	Date: 02/08	Show Preempted: Various--4 times
	Time: Prime	Show Aired: Houston Texan Football
	Reason: High local interest in Houston's new expansion team	

B	Date: 00/12/09	Show Preempted: Sports World
	Time: 1 pm	Show Aired: Kiwanis Club Auction
	Reason: Aired Kiwanis club auction as fund raising project for organization to further their ability to help local needy families.	

C	Date: 3/5, 3/6, 6/4	Show Preempted: Dateline, Fighting Fitzgerald's, Weakest Link
	Time: 7 pm	Show Aired: Billy Graham Crusade
	Reason:	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KLAS

Affiliation:

CBS

A	Date: 02/03/02	Show Preempted: Touched by an Angel
	Time: 7 pm	Show Aired: UNLV Football
	Reason: Local university game	
B	Date: 02/09/01	Show Preempted: All prime time
	Time: 8 pm	Show Aired: MDA Telethon
	Reason: Fundraising to support local community	
C	Date: 01/04/02	Show Preempted: King of Queens/Raymond
	Time: 8 pm	Show Aired: George Knapp Reports
	Reason: Local investigative documentary	
D	Date: 02/10/27	Show Preempted: CBS Evening News
	Time: 5:30 pm	Show Aired: Congressional #1 Debate
	Reason: Debate between candidates for Congressional District #1	
E	Date: 99/12/23	Show Preempted: Chicago Hope
	Time: 9 pm	Show Aired: Home for the Holidays
	Reason: Local special promoting adoptions.	

Station Call Sign: KMEG

Affiliation:

CBS

A	Date: 02/02/06	Show Preempted: CBS Primetime
	Time: 7 pm	Show Aired: ISU Basketball
	Reason: KMEG airs 10-12 games per season--strong local following	
B	Date: 02/10/20	Show Preempted: CBS Sports Spectacular
	Time: 4 pm	Show Aired: SD Governor's Debate
	Reason: Impending election	
C	Date: 02/10/20	Show Preempted: CBS Evening News
	Time: 5 pm	Show Aired: IA 5th Dist. Debate
	Reason: Impending election	
D	Date: 01/12/01	Show Preempted: CBS Prime
	Time: 8 pm	Show Aired: ISU B-Ball
	Reason: Strong local following	
E	Date: 00/11/21	Show Preempted: CBS Prime
	Time: 8 pm	Show Aired: Morningside Bball
	Reason: Local college played Iowa State in basketball, local following	

Station Call Sign: WOAI

Affiliation:

NBC

A	Date: 95/01/28 Time: 7:30 pm	Show Preempted: Empty Nest Show Aired: 4 Kid's Sake: Children in Crisis
	Reason: Children in Crisis is a 30 minute documentary about how low income, at risk kids deal with the violence they face each day. The documentary shares their struggles in an effort to build support for community programs to stop the violence.	
B	Date: 97/04/11 Time: 7 pm	Show Preempted: Unsolved Mysteries Show Aired: 1997 Mayoral debate
	Reason: The 1997 Mayoral candidates face-off on the issues to help voters become better informed.	
C	Date: 98/05/30 Time: 7 pm	Show Preempted: Bloopers/The Pretender/Profiler Show Aired: Children's Miracle Network Telethon
	Reason: CMNT is fund raiser where millions of dollars are pledged to benefit the Santa Rosa Children's Hospital.	
D	Date: 98/12/31 Time: 7 pm	Show Preempted: Providence/Dateline/Law & Order Show Aired: Celebrate San Antonio
	Reason: The first annual Celebrate San Antonio New Year's Celebration, LIVE, from downtown S.A. Enjoy the entertainment and fireworks as our local news team brings the celebration to your home.	
E	Date: 01/09/21 Time: 7 pm	Show Preempted: Dateline Show Aired: America on Alert: A News 4 San Antonio special
	Reason: A look back at how events of 9/11 impacted our city	

Station Call Sign: KMOV

Affiliation:

CBS

A	Date: 00/07/04 Time: 9 pm	Show Preempted: Judging Amy Show Aired: Fair St. Louis Finals
	Reason: Locally produced programming	
B	Date: 00/04/21 Time: 7 pm	Show Preempted: Kids Say Darndest Things Show Aired: Opening Doors
	Reason: Locally produced programming	
C	Date: 00/01/08 Time: 9 pm	Show Preempted: Walker, Texas Ranger Show Aired: UNCF Telethon
	Reason: Locally, nationally produced programming	
D	Date: 99/12/17 Time: 7 pm	Show Preempted: Kids Say Darndest Things Show Aired: Y2K, Are You Ready
	Reason: Locally produced programming	
E	Date: 98/12/18 Time: 7 pm	Show Preempted: The Nanny/Maggie Winters Show Aired: Forest Park Reborn
	Reason: Locally produced programming	

Station Call Sign: KMTR

Affiliation:

NBC

A	Date: Labor Day Time: 7 am	Show Preempted: Today Show Show Aired: MDA Telethon
	Reason: To air telethon & generate funds for local chapter.	

B	Date: 98/05/21 Time: 1 pm	Show Preempted: Soaps Show Aired: Local breaking news
	Reason: School shooting	

C	Date: Labor Day Time: 1 pm	Show Preempted: Soaps Show Aired: MDA Telethon
	Reason:	

D	Date: Time:	Show Preempted: Show Aired:
	Reason:	

E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: KMTV

Affiliation:

CBS

A	Date: Time:	Show Preempted: Show Aired:
	Reason:	

B	Date: Time:	Show Preempted: Show Aired:
	Reason:	

C	Date: Time:	Show Preempted: Show Aired:
	Reason:	

D	Date: Time:	Show Preempted: Show Aired:
	Reason:	

E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: KNDO

Affiliation:

NBC

A	Date: 01/11/03	Show Preempted: NBC Nightly News
	Time: 3 pm	Show Aired: Local Basketball
	Reason: Aired local basketball game	

B	Date: 01/12/08	Show Preempted: Sportsworld
	Time: 8 am	Show Aired: Food Drive
	Reason: Annual community food drive	

C	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KNOE

Affiliation:

CBS

A	Date: 02/10/29	Show Preempted: JAG
	Time: 7 pm	Show Aired: Louisiana US Senate Debate
	Reason: Top candidates for US Senate discuss issues	

B	Date: 02/10/30	Show Preempted: 60 Minutes II
	Time: 7 pm	Show Aired: Congressional Debate
	Reason: Top candidates for 5th Congressional District (LA) discuss issues before Nov. 5 election	

C	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KOAA

Affiliation:

NBC

A	Date: 02/10/13	Show Preempted: Dateline NBC
	Time: 6 pm	Show Aired: Allard-Strickland Debate
	Reason:	
B	Date: 1991-2001	Show Preempted: NBC Prime
	Time:	Show Aired: Broncos pre-season
	Reason: We aired two or three Denver Broncos pre-season games every year 1991-2001	
C	Date: 1993-1995	Show Preempted: NBC Prime/Wknd Sports
	Time:	Show Aired: Colo. Rockies Baseball
	Reason: We averaged 30 Rockies baseball games. Games aired in primetime or during wknd afternoon.	
D	Date: 1996-2001	Show Preempted: NBC Prime & Sports
	Time:	Show Aired: Colorado Rockies
	Reason: Our preemptions due to Rockies baseball has decreased year to year. In 2001, we were down to two games aired.	
E	Date: 1991-2001	Show Preempted: NBC Prime, Latenight, and Daytime
	Time:	Show Aired: Jerry Lewis MDA Telethon
	Reason:	

Station Call Sign: KOB

Affiliation:

NBC

A	Date: 94/05/29	Show Preempted: I Witness Video
	Time: 6 pm	Show Aired: Dyson & Co. Primary Election Spl
	Reason: Provide viewers with candidates running for office	
B	Date: 95/08/15	Show Preempted: John Larroquette Show
	Time: 8:30 pm	Show Aired: Cavalcade of Enchantment: The Railroad
	Reason: Half-hour series on New Mexico history	
C	Date: 95/02/08	Show Preempted:
	Time: 7 pm	Show Aired: Confronting Violence: A Search for Solutions
	Reason:	
D	Date: 99/08/27	Show Preempted: Dateline NBC
	Time: 9 pm	Show Aired: Eyewitness News 4 Education Town Hall
	Reason:	
E	Date: 00/05/15	Show Preempted: Third Watch
	Time: 9 pm	Show Aired: Los Alamos Disaster: A Town Hall Meeting
	Reason:	

Station Call Sign: KOB

Affiliation:

NBC

A	Date: N/A Time: N/A	Show Preempted: N/A Show Aired: Pac 10 Football
	Reason:	

B	Date: Time:	Show Preempted: Show Aired:
	Reason:	

C	Date: Time:	Show Preempted: Show Aired:
	Reason:	

D	Date: Time:	Show Preempted: Show Aired:
	Reason:	

E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: KOCO

Affiliation:

ABC

A	Date: 96/04/19 Time: 8 pm	Show Preempted: Step by Step/Hanging with Mr. Cooper Show Aired: News Special: We Will Never Forget
	Reason: 1 yr. Anniversary of OKC Murrah Bldg bombing.	

B	Date: 97/04/10 Time: 7 pm	Show Preempted: ABC Show Aired: 5 Who Care
	Reason: 1 hr. local special to honor unsung volunteers in Okla.	

C	Date: 98/05/31 Time: 11 am	Show Preempted: ABC Sports Show Aired: Children's Miracle Network
	Reason: Telethon raises donations for Children's Hospitals around the country	

D	Date: 99/12/30 Time: 8 pm	Show Preempted: ABC Special Show Aired: OU Football-Independence Bowl
	Reason: Special to celebrate OU going to a bowl-for many OU fans	

E	Date: 00/04/19 Time: 8:30 am	Show Preempted: GMA & part of The View Show Aired: OKC Memorial Anniv.
	Reason: 5th year anniversary of OKC bombing.	

Station Call Sign: KOMO

Affiliation:

ABC

A	Date: 02/01/05 Time: 9 pm	Show Preempted: Sit-coms Show Aired: KOMO Local town meeting
	Reason: Governor speaking about transportation problems	
B	Date: 00/06/16 Time: 8 pm	Show Preempted: Sitcoms Show Aired: Heroes in Havana
	Reason: Local little league team playing in Havana, Cuba. Part of our "For Kids Sake" local franchise	
C	Date: 01/12/09 Time: 7 pm	Show Preempted: ABC Sunday Movie Show Aired: ESPN Seattle Seahawk football
	Reason: DB to 12-15, 3-5 pm	
D	Date: 00/12/13 Time: 9 pm	Show Preempted: Hopking 24-7 Show Aired: Health Watch Special
	Reason: KOMO 4 news spl. special about heart attack...the Silent Killers. DB to 2:05 am	
E	Date: 00/03/31 Time: 8 pm	Show Preempted: Sitcoms Show Aired: Town Meeting, I-695
	Reason: Taxation Initiative-statewide ballot issue	

Station Call Sign: KOSA

Affiliation:

CBS

A	Date: 01/04/21 Time: 7 pm	Show Preempted: Walker, District, CBS Sun Morn, Face the Nation, Cup, CBS evening news Show Aired: Easter Seals Telethon
	Reason: Telethon Sat 7p-12mid/Sun 12:01a-6p	
B	Date: 00/07/08 Time: 8 pm	Show Preempted: Walker Tx Ranger Show Aired: Ms. Texas Scholarship Pageant
	Reason: Local contestants in pageant	
C	Date: 99/12/24 Time: 10:35 pm	Show Preempted: CBS Christmas Eve Special Show Aired: 1st Baptist Church Christmas Pageant
	Reason: Religious (local)	
D	Date: Fall '98 Time: 11 am	Show Preempted: NFL Today (Entire Season) Show Aired: 1st Baptist Church Odessa
	Reason: Religious	
E	Date: 96/03/05 Time: 7 pm	Show Preempted: The Client Show Aired: Billy Graham Crusade
	Reason: Religious	

Station Call Sign: KOTV

Affiliation:

CBS

A	Date: 02/01/25 Time: 7 pm	Show Preempted: JAG Show Aired: St. Jude Special
	Reason: Public service program	
B	Date: 02/06/26 Time: 7 pm	Show Preempted: 60 Min. II Show Aired: The Oklahomans
	Reason: Viewer interest in famous Oklahomans	
C	Date: 02/10/29 Time: 8 pm	Show Preempted: The Guardian Show Aired: Governor's Debate
	Reason: Public service program	
D	Date: 02/12/06 Time: 8 pm	Show Preempted: Hack Show Aired: Big 12 Blitz
	Reason: OU was in Big 12 Championship	
E	Date: 02/12/15 Time: 7:30 pm	Show Preempted: King of Queens Show Aired: Dust to Dreams: The Okie Legacy
	Reason: In-house special produced about Dust Bowl	

Station Call Sign: KPAX

Affiliation:

CBS

A	Date: 01/02/10 Time: 9 pm	Show Preempted: Walker Texas Ranger Show Aired: Local college basketball
	Reason: Local sports package	
B	Date: 00/09/03 Time: 7 pm	Show Preempted: Touched by an Angel Show Aired: MDA Telethon
	Reason: Televisé every year	
C	Date: 99/10/16 Time: 8 pm	Show Preempted: Martial Law Show Aired: Local college football
	Reason: Local sports package	
D	Date: 98/10/28 Time: 7 pm	Show Preempted: The Nanny Show Aired: Local congressional debate
	Reason:	
E	Date: 97/05/31 Time: 7 pm	Show Preempted: Dr. Quinn Show Aired: Children's Miracle Network Telethon
	Reason:	

Station Call Sign: KPHO

Affiliation:

CBS

A	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	
B	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	
C	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	
D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	
E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KPRC

Affiliation:

NBC

A	Date: 02/01/06	Show Preempted: Movie of the Week: Golden Eye
	Time: 7 pm	Show Aired: United Negro College Fund Telethon
	Reason: UNCF Telethon has aired on KPRC, Channel 2, for over 25 years	
B	Date: 02/01/26	Show Preempted: Law & Order/Law & Order: CI/Law & Order: SVU
	Time: 7 pm	Show Aired: One Houston United/Telethon for Allison Flood Vic
	Reason: All four networks joined together in telethon and raised over \$2 million for flood victims still suffering from Allison.	
C	Date: 02/03/25	Show Preempted: Fear Factor
	Time: 7 pm	Show Aired: Dateline Houston
	Reason: KPRC production featuring updates on recent local news stories	
D	Date: 02/08/13	Show Preempted: Just Shoot Me
	Time: 7 pm	Show Aired: Inside Reliant Park
	Reason: This KPRC production featured "Reliant Park," new home of Houston's new NFL team, the Texans.	
E	Date: 02/10/19	Show Preempted: Forensic Files
	Time: 7 pm	Show Aired: Dateline Houston: Up Close with the Candidates
	Reason: KPRC, Channel 2, produced this election special.	

Station Call Sign: KPVI

Affiliation:

NBC

A	Date: ? Time: 7 pm	Show Preempted: God, the Devil & Bob Show Aired: ?
	Reason: Cartoon depiction of material that taught disrespect. Felt it inappropriate for children @ 7 pm who would be affected by cartoon.	

B	Date: 02/10/29 Time: 7 pm	Show Preempted: Just Shoot Me/In Laws Show Aired: Gov. Debate
	Reason: Part of statewide network	

C	Date: 02/10/30 Time: 7 pm	Show Preempted: Ed Show Aired: Senate Debate
	Reason: Part of statewide network.	

D	Date: '01 Time: 7 pm	Show Preempted: Prime Time Show Aired: NCAA Women's Basketball ISU
	Reason: Local University team in playoffs	

E	Date: '98 Time:	Show Preempted: Kids shows Show Aired: Disney Parade Coverage
	Reason: Only time Disney Parade would be in Pocatello	

Station Call Sign: KRBC

Affiliation:

NBC

A	Date: 01/09/02 Time: 8 pm	Show Preempted: Prime Show Aired: MDA Telethon
	Reason:	

B	Date: 01/09/03 Time: 7 am	Show Preempted: Today/Soaps Show Aired: MDA Telethon
	Reason: Also 9/3/01 12p – 2p Soaps, MDA Telethon	

C	Date: 01/11/04 Time: 10:35 pm	Show Preempted: Tonight Show & Conan Show Aired: Lcl Football game
	Reason: Crosstown rivalry	

D	Date: 02/07/06 Time: Various	Show Preempted: Tennis Show Aired: Local weather cut ins
	Reason: Due to local flood station did lcl weather cut ins	

E	Date: 01/12/04 Time: 7 pm	Show Preempted: Prime Show Aired: Religious Prgm
	Reason:	

Station Call Sign: KRCG

Affiliation:

CBS

A	Date: 02/11/14 Time: 8 pm	Show Preempted: Amazing Race, Garth Brooks Spl Show Aired: Missouri U. Basketball
	Reason: One of the few prime-time opportunities for Missouri basketball fans to see their top-10 rated team on broadcast TV.	
B	Date: 01/11/30 Time: 3 pm	Show Preempted: Olympic Winterfest Show Aired: Mo. H.S. 5-A football championship
	Reason: Long-standing commitment to air this game which highlighted the premier high school teams in Missouri	
C	Date: 92/05/06 Time: 2 pm	Show Preempted: Guiding Light Show Aired: Gorbachev at Westminster
	Reason: KRCG aired live coverage of the appearance by former soviet leader Mikhael Gorbachev dedicating memorial at Fulton, MO's Westminster College to mark the end of the "Cold War."	
D	Date: 00/10/20 Time: 11 am	Show Preempted: Young & Restless, Bold & Beautiful Show Aired: Mel Carnahan funeral
	Reason: Live coverage of memorial procession and service for Gov. Carnahan, who died in a plane crash earlier in the week.	
E	Date: 93/07/27 Time: 7 pm	Show Preempted: CBS Rescue 911 Show Aired: Flood Relief Telethon
	Reason: Special live program from Jefferson City's Capital Mall to garner donations for relief for the area victims of the "Flood of '93."	

Station Call Sign: KRCR

Affiliation:

ABC

A	Date: 02/08/24 Time: 6 am	Show Preempted: ABC Kids Re-Schedule Show Aired: Outdoor Magazine/P. Allen Smith Gardens
	Reason: Re-sked non-FCC kids. Station had met FCC requirement.	
B	Date: 02/11/30 Time: 6 am	Show Preempted: ABC Kids Re-Schedule Show Aired: Outdoor Magazine/P. Allen Smith Gardens
	Reason: Re-sked non-FCC kids. Station had met FCC requirement.	
C	Date: 02/12/07 Time: 5 am	Show Preempted: ABC Kids Re-Schedule Show Aired: Outdoor Magazine/P. Allen Smith Gardens
	Reason: Re-sked non-FCC kids. Station had met FCC requirement.	
D	Date: Time:	Show Preempted: Show Aired:
	Reason:	
E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: KRDO

Affiliation:

ABC

A	Date: 01/01/06 Time: 3 hrs.	Show Preempted: Sat. Movie: The Rock Show Aired: C.C. Hockey game
	Reason: Local sporting event (Colorado College)	
B	Date: 01/03/10 Time: 3 hrs.	Show Preempted: Sat. primetime Show Aired: C.C. Hockey game
	Reason: Same as above	
C	Date: 01/10/11 Time: 1 hr.	Show Preempted: Whose Line Show Aired: Women's Health series
	Reason: Contract specified--must air in primetime	
D	Date: 01/11/04 Time: 1 hr.	Show Preempted: This Week Show Aired: ABC Sports
	Reason: ABC Sports changed broadcast time, aired in "This Week" time slot. No room to go elsewhere.	
E	Date: 01/12/31 Time: 1/2 hr.	Show Preempted: Port Charles Show Aired: ABC New Year Shows
	Reason: Same as above	

Station Call Sign: KRGV

Affiliation:

ABC

A	Date: 01/07/01 Time: 6 pm	Show Preempted: Wonderful World of Disney Show Aired: Teach the Children telethon
	Reason: Local charity done by the station	
B	Date: 01/04/05 Time: 7 pm	Show Preempted: Whose Line Is It Anyway Show Aired: McAllen Mayor Debate
	Reason:	
C	Date: 01/08/04 Time: 7 pm	Show Preempted: ABC Big Picture Show Show Aired: Dallas Preseason Game
	Reason: We have a contract to air the Dallas preseason games. We air several games per season.	
D	Date: 01/04/01 Time: 1 pm	Show Preempted: Liberty Mutual Legends of Golf & World Figure Skating Show Aired: Easter Seals Telethon
	Reason:	
E	Date: 01/03/01 Time: 7 pm	Show Preempted: America's Funniest Home Videos Show Aired: Gov. Debate
	Reason:	

Station Call Sign: KRIS

Affiliation:

NBC

A	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

B	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

C	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KRNV

Affiliation:

NBC

A	Date: 02/03/17	Show Preempted: Prime
	Time: 3 pm	Show Aired: NV Humane Society Telethon
	Reason: Local event (annual event in March)	

B	Date: 02/11/02	Show Preempted: Notre Dame
	Time: 12 noon	Show Aired: UNR Football
	Reason: Local sports--college football	

C	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KSAT

Affiliation:

ABC

A	Date: 00/08/08 Time: 8 pm	Show Preempted: Drew Carey Show Aired: KSAT 12 News Special Report: City Issues
	Reason: Aired special on San Antonio city issues.	
B	Date: 00/08/22 Time: 8 pm	Show Preempted: Drew Carey Show Aired: KSAT 12 News Special Report: Term Limits
	Reason: Special on term limits in San Antonio	
C	Date: 00/08/14 Time: 7 pm	Show Preempted: Am. Funniest Home Videos Show Aired: Billy Graham Crusade
	Reason: Religious Programming.	
D	Date: 00/11/29 Time: 5 am	Show Preempted: ABC World News This Morning Show Aired: Special edition of GMSA @ 5 am
	Reason: Due to weather	
E	Date: 99/02/15 Time: 7 pm	Show Preempted: Who Wants to be a Millionaire, Dharma & Greg, Sportsnight Show Aired: Spurs Basketball game
	Reason: Sports programming of home team.	

Station Call Sign: KSDK

Affiliation:

NBC

A	Date: 91/07/04 Time: 6:30 pm	Show Preempted: Cosby Show Show Aired: Welcome Home Desert Storm
	Reason: Military personnel from Scott Air Force Base (located in St. Louis market) were returning from service in Desert Storm. This special aired approximately on July 4th.	
B	Date: 92/03/05 Time: 7:30 pm	Show Preempted: A Different World Show Aired: People Like You and Me
	Reason: KSDK reporter Deanne Lane hosted a special regarding the homeless problem in St. Louis. This began as news story and became a special as we learned about the significance of the homeless problem.	
C	Date: 98/04/18 Time: 7 pm	Show Preempted: Newsradio Show Aired: Face to Face: I Can Quit
	Reason: KSDK Anchor Karen Foss sat down with a group of teenage girls who were heavy smokers and challenged them to quit. What started as a news story about the high number of female teenage smokers became a campaign and challenge to a group of teenage girls in this special.	
D	Date: 99/07/06 Time: 5:30 pm	Show Preempted: NBC Nightly News Show Aired: Local, live coverage of Pres. Clinton in East St. Louis
	Reason: Local, live coverage of President Clinton in East St. Louis.	
E	Date: 00/01/14 Time: 7 pm	Show Preempted: Providence Show Aired: Rams Plus: Gotta Go to Work
	Reason: This special celebrated the Rams march to the NFC Championship, which was to be played Jan. 16, 2000. (Ultimately, the Rams won the Superbowl 2 weeks later.)	

Station Call Sign: KSFY

Affiliation:

ABC

A	Date: 01/06/12	Show Preempted: ABC Prime & Nightline
	Time: 7 pm	Show Aired: Weather coverage
	Reason: Multiple tornadoes and storms in our area	

B	Date: 00/03/12	Show Preempted: ABC Prime
	Time: 8 pm	Show Aired: SD State HS Hockey Champ.
	Reason: Final game coverage of the state tournament	

C	Date: 98/05/23	Show Preempted: ABC Prime
	Time: 9 pm	Show Aired: Best of Dakota
	Reason: Award show recognizing many of the "best" in SD	

D	Date: 96/09/22	Show Preempted: ABC Prime
	Time: 6 pm	Show Aired: Congressional forum
	Reason: Political year	

E	Date: 95/09/07	Show Preempted: ABC Prime
	Time: 8 pm	Show Aired: Town Hall Meeting
	Reason: Local town hall meeting on Medicare	

Station Call Sign: KSL

Affiliation:

NBC

A	Date: Various	Show Preempted: Sat. Aft/Night
	Time:	Show Aired: Football/Bball game
	Reason: BYU football or basketball games	

B	Date:	Show Preempted: God, Devil, Bob
	Time: 7:30 pm	Show Aired: Mad About You
	Reason: Content Concerns	

C	Date: 02/10/09	Show Preempted: Tonight Show
	Time: 10:35 pm	Show Aired: Suddenly Susan, Paid
	Reason: Content concerns	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KSLA

Affiliation:

CBS

A	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

B	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

C	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KSNT

Affiliation:

NBC

A	Date: 96/06/01	Show Preempted: n/a
	Time: 8 pm	Show Aired: CMN
	Reason: Raising money for Children's Miracle Network	

B	Date: 98/07/01	Show Preempted: n/a
	Time: 7 pm	Show Aired: St. Jude Special
	Reason: Special programming for St. Jude Hospital funding.	

C	Date: 99/12/05	Show Preempted: NBC Sports
	Time: 1 pm	Show Aired: KU Basketball
	Reason: Local sports special	

D	Date: 00/11/07	Show Preempted: NBC Nightly News
	Time: 5:30 pm	Show Aired: 27 News Local
	Reason: Special news story	

E	Date: 01/12/07	Show Preempted: Providence
	Time: 7 pm	Show Aired: Billy Graham
	Reason: Special religious program	

Station Call Sign: KSWO

Affiliation:

ABC

A	Date: 96/01/20	Show Preempted: ABC Prime Time
	Time: 7 pm	Show Aired: Local basketball tournament finals
	Reason: Finals of a local sporting event, geared toward smaller schools in the area	
B	Date: 98/12/02	Show Preempted: ABC Kids/Sports
	Time: 9 am	Show Aired: Share Your Christmas
	Reason: Local effort to raise funds for the food bank in Lawson, Oklahoma	
C	Date: 97/07/04	Show Preempted: ABC Prime Movie
	Time: 8 pm	Show Aired: Miss Texas Pageant
	Reason: Local beauty pageant promoting Texas, which is part of the ABC Miss America show	
D	Date: 96/09/02	Show Preempted: ABC Prime
	Time: 7:30 pm	Show Aired: Gridiron 7
	Reason: Local sports show promoting local area football	
E	Date: 97/04/01	Show Preempted: ABC Prime
	Time: 7 pm	Show Aired: 5th Season Weather Show
	Reason: Local weather show dealing with severe weather, tornadoes, safety issues, for local residents	

Station Call Sign: KTGF

Affiliation:

NBC

A	Date: 01/12/01	Show Preempted: NBC Sports
	Time: 12 Noon	Show Aired: Grizzly football
	Reason: Playoffs	
B	Date: 01/12/08	Show Preempted: NBC Sports
	Time: 12 Noon	Show Aired: Grizzly football
	Reason: Playoffs	
C	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	
D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	
E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KVLV

Affiliation:

NBC

A	Date: 02/11	Show Preempted: Prime
	Time:	Show Aired: ND High School football tourney
	Reason:	

B	Date: 02/08	Show Preempted: Prime
	Time:	Show Aired: Local, minor league baseball
	Reason:	

C	Date: 02/10	Show Preempted: Soaps
	Time:	Show Aired: Breaking news coverage of Wellstone crash
	Reason:	

D	Date: 02/03	Show Preempted: Prime
	Time:	Show Aired: ND H.S. Basketball Tourney
	Reason:	

E	Date: 01/02	Show Preempted: Prime
	Time:	Show Aired: NS H.S. Hockey Tourney
	Reason:	

Station Call Sign: KTHV

Affiliation:

CBS

A	Date: 97/09/25	Show Preempted: Young & Restless
	Time: 11 am	Show Aired: Foundations of Freedom
	Reason: 40th Anniversary of integration of Little Rock Central High School	

B	Date: 02/06/02	Show Preempted: Franklin/Oswald, CBS Sunday Morning, Face the Nation, Kemper Open
	Time: 7 am	Show Aired: Children's Miracle Network Telethon
	Reason: Telethon to raise money for Arkansas Children's Hospital	

C	Date: 02/06/07	Show Preempted: JAG
	Time: 7 pm	Show Aired: St. Jude Hospital
	Reason: Paid program seeking funds for the hospital	

D	Date: 02/12/06	Show Preempted: 48 Hours
	Time: 7 pm	Show Aired: St. Jude Hospital
	Reason: Paid program seeking funds for the hospital	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KTIV

Affiliation:

NBC

A	Date: 02/05	Show Preempted: Sitcoms (NBC)
	Time: 7 pm	Show Aired: Debate
	Reason: Primary, gubernatorial debate	
B	Date: 02/06	Show Preempted: Sports
	Time: 4 pm	Show Aired: CMN Telethon
	Reason: Annual fund-raiser	
C	Date: 02/07	Show Preempted: Net. Drama
	Time: 7 pm	Show Aired: River-cade Parade
	Reason: Annual festival parade	
D	Date: 02/10	Show Preempted: Sports
	Time: 12 noon	Show Aired: Fall Ford Festival
	Reason:	
E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KTKA

Affiliation:

ABC

A	Date: 01/10/28	Show Preempted: ABC Skate America
	Time: 12 noon	Show Aired: High School Football Game of the Week
	Reason: Commitment to our community--we air local high school games as part of that commitment.	
B	Date: 00/10/29	Show Preempted: Skate America
	Time: 12:30 pm	Show Aired: High School Football Game of the Week
	Reason: Same as above. Allows local athletes to get TV coverage for family & friends and college recruiters to view their talents.	
C	Date: 99/01/13	Show Preempted: ABC Prime Sitcoms
	Time: 7 pm	Show Aired: K-State Basketball at Nebraska
	Reason: Part of contract we had with the University.	
D	Date: 96/01/02	Show Preempted: ABC Prime
	Time: 7 pm	Show Aired: KU vs. Cornwall Basketball
	Reason: Contract to carry game w/University	
E	Date: 96/10/24	Show Preempted: High Incident
	Time: 7 pm	Show Aired: Gen. Election debate – live Brownback v. Docking
	Reason: Public service	

Station Call Sign: KTMF Affiliation: ABC

A	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

B	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

C	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KTNV Affiliation: ABC

A	Date: 01/08/22	Show Preempted: My Wife & Kids
	Time: 8 pm	Show Aired: D.R. Journal
	Reason: Half hour medical show that was hosted by a local D.R.	

B	Date: 00/06/03	Show Preempted: Movie
	Time: 9 pm	Show Aired: St. Jude's & Access Hollywood
	Reason: St. Jude's was a paid program & Access Hollywood filled the other hour	

C	Date: All Season	Show Preempted: The View
	Time: 10 am	Show Aired: Howie Mandel
	Reason: The View was not getting very good ratings--making it difficult to sell.	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KTTC

Affiliation: NBC

A	Date: 02/10/29 Time: 6:30 pm	Show Preempted: Just Shoot Me, In Laws, Frasier, Hidden Hills/Datelin Show Aired: Memorial Service for Paul Wellstone
	Reason: Tragic plane crash, 4-days earlier killing Senator, wife, daughter, staff members and plane crew.	
B	Date: 97/12/30 Time: 7 pm	Show Preempted: ? Show Aired: Chi. Bulls/MN Timberwolves
	Reason: Rare occasion for area viewers to see a telecast of MN Timberwolves (NBA) vs. Michael Jordan w/ Chicago Bulls at home in Minneapolis, MN	
C	Date: 01/01/20 Time: 7:30 pm	Show Preempted: Sat Prime/SNL/Sun Today and more Show Aired: 48th Annual Eagles Cancer Telethon
	Reason: 48th year of "this grass roots", locally produced telethon by KTTC to raise funds for cancer research at Mayo Clinic in Rochester, Minnesota. Entertainment offered by "neighbors" from all over our KTTC coverage area in MN & IA & WI. As of this report 8 million plus dollars have been raised by this annual event.	
D	Date: 97/03/05 Time: 7 pm	Show Preempted: Frasier/Chicago Sons Show Aired: Billy Graham Crusade Spec.
	Reason: Religious--station has made airtime available to this evangelistic association since the 1960s (at least).	
E	Date: 95/11/24 Time: 9:30 am	Show Preempted: ? Show Aired: MN Prep Bowl XIV (High School Football Championships)
	Reason: Out of 5 class Championship games, 4 included teams from various small and large communities in our SE Minnesota coverage area.	

Station Call Sign: KTUL

Affiliation: ABC

A	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

B	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

C	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KTVB

Affiliation:

NBC

A	Date: 01/01/21 Time: 11 am	Show Preempted: First 3hrs NBA Show Aired: CBN Live telethon
	Reason: Aired live telethon	
B	Date: 02/06/03 Time: 7 pm	Show Preempted: Fear Factor Show Aired: Billy Graham Movie
	Reason: Aired Billy Graham movie "The Climb"	
C	Date: 02/06/02 Time: 7 am	Show Preempted: Sunday Today, Meet the Press Show Aired: Arkansas Children's Miracle Telethon
	Reason: Aired live telethon	
D	Date: 01/06/03 Time: 7 am	Show Preempted: Sunday Today, Meet the Press Show Aired: Children's Miracle Telethon
	Reason: Aired telethon live	
E	Date: 01/06/04 Time: 7 pm	Show Preempted: Dateline/Weakest Link Show Aired: Billy Graham special
	Reason: Aired Billy Graham spec.	

Station Call Sign: KTVN

Affiliation:

CBS

A	Date: 1997 Time:	Show Preempted: Prime Show Aired: News
	Reason: Flood emergency coverage	
B	Date: All years Time:	Show Preempted: Prime Show Aired: Billy Graham
	Reason:	
C	Date: Time:	Show Preempted: Show Aired:
	Reason:	
D	Date: Time:	Show Preempted: Show Aired:
	Reason:	
E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: KRQE

Affiliation:

CBS

A	Date: 02/09/01 Time: 8 pm	Show Preempted: CBS Movie Show Aired: MDA telethon
	Reason: Annual MDA telethon	
B	Date: 02/09/21 Time: 7 pm	Show Preempted: CBS Prime Show Aired: UNM Lobo football
	Reason: Local coverage of UNM football game (NCAA)	
C	Date: 02/01/21 Time: 7 pm	Show Preempted: CBS Prime Show Aired: UNM Lobo Basketball
	Reason: Local coverage of UNM Lobo basketball (NCAA)	
D	Date: 02/02/27 Time: 7 pm	Show Preempted: CBS Prime Show Aired: Red Cross Telethon
	Reason: Locally produced telethon for Red Cross fundraiser	
E	Date: 02/12/15 Time: 7:30 pm	Show Preempted: CBS Prime Show Aired: UNM Lobo basketball
	Reason: Local coverage of UNM Lobo basketball (NCAA)	

Station Call Sign: KULR

Affiliation:

NBC

A	Date: 02/11/02 Time: 12 noon	Show Preempted: Notre Dame football Show Aired: Univ. of MT football
	Reason: Viewer demand	
B	Date: 02/10/19 Time: 1 pm	Show Preempted: NASCAR/Golf Show Aired: Univ. of MT football
	Reason: Viewer demand	
C	Date: 01/12/01 Time: 12 noon	Show Preempted: Sportsworld/Golf Show Aired: Univ. of MT football playoff
	Reason: Viewer demand	
D	Date: Time:	Show Preempted: Show Aired:
	Reason:	
E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: KVEO

Affiliation:

NBC

A	Date: 97/06/20 Time: 7 pm	Show Preempted: Unsolved Mysteries Show Aired: St. Jude's Children's Hosp.
	Reason: Community service	

B	Date: 98/04/10 Time: 7 pm	Show Preempted: Players Show Aired: "Resurrection" 1st Baptist Church
	Reason: Community service	

C	Date: 99/06/12 Time: 7 pm	Show Preempted: The Pretender Show Aired: Billy Graham
	Reason: Community service	

D	Date: 00/06/05 Time: 7 pm	Show Preempted: Dateline Show Aired: Billy Graham
	Reason: Community service	

E	Date: 01/03/26 Time: 7 pm	Show Preempted: The Crocodile Hunter Show Aired: St. Jude's Children's Hosp.
	Reason: Community service	

Station Call Sign: KVIA

Affiliation:

ABC

A	Date: Fall '02 Time: 11:05 pm	Show Preempted: Up Close Show Aired: Borderland Blitz
	Reason: High School football roundup	

B	Date: 02/08/17 Time: 2 pm	Show Preempted: Various Show Aired: Humane Society Telethon
	Reason: Annual event	

C	Date: 02/11/05 Time: 10:35 pm	Show Preempted: Nightline Show Aired: ABC 7 Xtra
	Reason: Local election coverage	

D	Date: 02/09/11 Time: 10:35 pm	Show Preempted: Nightline Show Aired: ABC 7 Xtra
	Reason: Local news coverage	

E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: KWQC

Affiliation:

NBC

A	Date: Fall	Show Preempted: NBC Sports
	Time:	Show Aired: Iowa/Big 10 Football
	Reason: Various games throughout the season	

B	Date: Spring	Show Preempted: NBC Sports
	Time: Weekend pm	Show Aired: Iowa/Big 10 Basketball
	Reason: Various games throughout the season	

C	Date: Spring	Show Preempted: Various
	Time: Prime	Show Aired: Iowa/Big 10 Basketball
	Reason: Various games throughout the season	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KWTW

Affiliation:

CBS

A	Date: 01/01/02	Show Preempted: JAG
	Time: 7 pm	Show Aired: Orange Bowl Blitz
	Reason: OK Sooners were in the Orange Bowl. This was a live special from Miami.	

B	Date: 01/01/11	Show Preempted: Diagnosis Murder
	Time: 7 pm	Show Aired: St. Jude's
	Reason: Annual commitment to St. Jude's.	

C	Date: 01/01/20	Show Preempted: That's Life & Walker Texas Ranger
	Time: 7 pm	Show Aired: OU Basketball game
	Reason: Provide viewers with a live OU basketball game	

D	Date: 01/03/06	Show Preempted: JAG
	Time: 7 pm	Show Aired: Billy Graham
	Reason: Part of our annual commitment made to Billy Graham.	

E	Date: 01/06/08	Show Preempted: Diagnosis Murder
	Time: 7 pm	Show Aired: Those Terrible Twisters
	Reason: Local weather special to keep viewers informed of tornado precautions, etc.	

Station Call Sign: KWTX

Affiliation:

CBS

A	Date: 95/01/22 Time: 11 am	Show Preempted: NCAA Basketball Show Aired: Local Church
	Reason: Joined basketball in progress @ 12n because of local church	
B	Date: 97/09/01 Time: 5 am	Show Preempted: All day parts Show Aired: MDA
	Reason: To broadcast 11 1/2 hours of MDA Telethon	
C	Date: 99/03/08 Time: 7 pm	Show Preempted: Cosby/King of Queens Show Aired: Texas 2000 Living Well in the New Millennium
	Reason: This program was part of local news project	
D	Date: 96/11/04 Time: 7 pm	Show Preempted: Ink Show Aired: Ross Perot for President
	Reason: Paid political	
E	Date: 01/09/02 Time: 10 am	Show Preempted: U.S. Open Tennis Show Aired: Local church
	Reason: Joined U.S. Open Tennis in progress to local church service	

Station Call Sign: KXJB

Affiliation:

CBS

A	Date: 02/12/03 Time: 7 pm	Show Preempted: JAG Show Aired: B. Graham
	Reason: Community Service.	
B	Date: 02/10/17 Time: 1 pm	Show Preempted: Daytime soaps Show Aired: Local news
	Reason: Sen. Wellstone plane crash	
C	Date: 02/09/06 Time: 7 pm	Show Preempted: CBS Prime Show Aired: B. Graham
	Reason: C.S.	
D	Date: 02/09/03 Time: 7 pm	Show Preempted: JAG Show Aired: B. Graham
	Reason: C.S.	
E	Date: 02/06/07 Time: 6:30 pm	Show Preempted: CBS Prime Show Aired: B. Graham
	Reason: C.S.	

Station Call Sign: KXLY

Affiliation:

ABC

A	Date: 02/09/11 Time: Noon	Show Preempted: ABC Special Report Show Aired:
	Reason: News 4 coverage of community prayer vigils held by city officials.	
B	Date: 02/09/11 Time: 6 pm	Show Preempted: ABC Special Report Show Aired:
	Reason: News 4 coverage of America Under Attack, coverage on community reaction of the attack, local ties to New York, advice from local experts of grief.	
C	Date: 01/06/28 Time: 8 pm	Show Preempted: ABC Prime Show Aired: CMN
	Reason: Coverage of Children's Miracle Network Telethon.	
D	Date: 01/02/28 Time: 11 am	Show Preempted: ABC Daytime Show Aired: Local News
	Reason: News 4 Special Report: Seattle Earthquake	
E	Date: 99/08/09 Time: 4:30 pm	Show Preempted: World News Show Aired: Local news
	Reason: Because of ABC Sports, this was the only window of opportunity for local news.	

Station Call Sign: KXTV

Affiliation:

ABC

A	Date: 01/02/27 Time: 8:30 pm	Show Preempted: Dharma & Greg Show Aired: Fed Up With The Power Crisis
	Reason: Locally-produced news special during time when power crisis was critical in California	
B	Date: 98/02/03 Time: 10:30 am	Show Preempted: The View, ABC Soaps Show Aired: Special Report
	Reason: Local news coverage of extensive flooding in Sacramento Valley	
C	Date: 00/02/16 Time: 8:25 pm	Show Preempted: Norm, Drew Carey, 20/20, Spin City Show Aired: Special Report
	Reason: Breaking news--plane crash in Sacramento area	
D	Date: 97/10/07 Time: 11 pm	Show Preempted: Nightline Show Aired: Special Report
	Reason: Breaking news coverage of detonation of Vietnam era bombs unearthed in Sacramento suburb field	
E	Date: 00/03/05 Time: 6:30 pm	Show Preempted: ABC Prime shows Show Aired: California Primary
	Reason: Live coverage of California primary election results	

Station Call Sign: KYTV

Affiliation: NBC

A	Date: 02/10/21 Time: 7 pm	Show Preempted: Fear Factor Show Aired: Senatorial debate
	Reason: This was an important race in our market. We also aired state congressional debates.	

B	Date: 02/06/06 Time: 7 pm	Show Preempted: Friends Show Aired: President's Speech
	Reason: This is the speech the networks chose to not carry. We felt it was relevant to our viewers.	

C	Date: 02/01/19 Time: 7 pm	Show Preempted: NBC Movie Show Aired: SMSU Basketball
	Reason: This regional sports offering is important to our community.	

D	Date: 02/06/02 Time: 12 noon	Show Preempted: WNBA, French Open Show Aired: Children's Miracle Network
	Reason: We have partnered with the CMN for many years, raising over 1 million annually.	

E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: KZTV

Affiliation: CBS

A	Date: Time:	Show Preempted: Show Aired:
	Reason:	

B	Date: Time:	Show Preempted: Show Aired:
	Reason:	

C	Date: Time:	Show Preempted: Show Aired:
	Reason:	

D	Date: Time:	Show Preempted: Show Aired:
	Reason:	

E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: WAFB

Affiliation:

CBS

A	Date: 98/12/28 Time: 8 pm	Show Preempted: Everybody Loves Raymond & Becker Show Aired: St. Jude Children's Hospital
	Reason: Paid program	

B	Date: 00/03/01 Time: 7 pm	Show Preempted: City of Angels Show Aired: SEC Basketball--LSU @ Auburn
	Reason: Sports of high local interest	

C	Date: 00/06/09 Time: 6:30 pm	Show Preempted: Kids Say Darndest Things, Candid Camera Show Aired: Billy Graham
	Reason: Religious paid program	

D	Date: 02/07/21 Time: 7 pm	Show Preempted: Touched by an Angel Show Aired: Crackdown on Crime: Unsolved Mysteries
	Reason: Public service program focusing on unsolved murders in the Baton Rouge area	

E	Date: 02/03/08 Time: 7 pm	Show Preempted: Touched by an Angel, The Agency, The District Show Aired: SEC Basketball Tournament
	Reason: Sports of local interest	

Station Call Sign: WAFF

Affiliation:

NBC

A	Date: 01/09/04 Time: 7 pm	Show Preempted: Spy TV Show Aired: Billy Graham
	Reason:	

B	Date: 01/09/12 Time: 9 pm	Show Preempted: ? Show Aired: Night of Prayer
	Reason:	

C	Date: 01/09/07 Time: 9 pm	Show Preempted: Law & Order Show Aired: Billy Graham
	Reason:	

D	Date: 01/12/03 Time: 7 pm	Show Preempted: Weakest Link Show Aired: Billy Graham
	Reason:	

E	Date: 01/12/04 Time: 7 pm	Show Preempted: Celebrities in Style Show Aired: Billy Graham
	Reason:	

Station Call Sign: WAKA

Affiliation:

CBS

A	Date: 02/09 Time: 8 pm	Show Preempted: CBS Sunday Movie Show Aired: MDA Telethon
	Reason:	

B	Date: Time:	Show Preempted: Show Aired:
	Reason:	

C	Date: Time:	Show Preempted: Show Aired:
	Reason:	

D	Date: Time:	Show Preempted: Show Aired:
	Reason:	

E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: WAPT

Affiliation:

ABC

A	Date: 01/04/29 Time: 5:30 pm	Show Preempted: World News Show Aired: Local mayor debates
	Reason:	

B	Date: 01/05/30 Time: 7 pm	Show Preempted: Prime Show Aired: Local tornado weather special
	Reason: To show people what to do to prepare for tornado and what you should look for during bad weather conditions	

C	Date: 01/06/03 Time: 5:30 pm	Show Preempted: World News Show Aired: Local mayor debates
	Reason:	

D	Date: 01/11/24 Time: 7 am	Show Preempted: Sat. kids programming Show Aired: Tornado weather coverage
	Reason: Tornado in Madison Co.	

E	Date: 00/08/31 Time: 7 pm	Show Preempted: Prime programming Show Aired: M3 Century Local News Spec.
	Reason: To review all the top news in 1999	

Station Call Sign: WBAY

Affiliation:

ABC

A	Date: 01/11/12	Show Preempted: Millionaire
	Time: 7 pm	Show Aired: Monday Night Kick-off
	Reason: To air local sports program for 17 weeks (aired since 1991)	

B	Date: 02/03/03	Show Preempted: Movie/Sports
	Time: 8 pm	Show Aired: CP Telethon, 47th Annual
	Reason: Local fundraiser (aired since 1954)	

C	Date: 93/06/05	Show Preempted: Movie
	Time: 8 pm	Show Aired: Children's Hospital Telethon
	Reason: Hospital fund raiser (aired since 1991)	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: WBIR

Affiliation:

NBC

A	Date: 1994-2000	Show Preempted: NBC Sunday Today
	Time: 8 am	Show Aired: Action 10 Weekend
	Reason: Local Sunday morning news program aired in place of national news program	

B	Date: 00/06/03	Show Preempted: Network Prime
	Time: 8 pm	Show Aired: Children's Miracle Network Telethon
	Reason: Annual fundraiser for local children's hospital	

C	Date: 93/11/13	Show Preempted: Notre Dame vs. Fla. State
	Time: 1:30 pm	Show Aired: SEC: Florida vs. So. Carolina
	Reason: Aired football game from local conference instead of network coverage of game not affecting local team. NBC program aired on another station and earned a much lower rating than the SEC game.	

D	Date: 93/10/30	Show Preempted: Pro Figure Skating
	Time: 4:30 pm	Show Aired: Carson Newman vs. Lenoir Rhyme
	Reason: Local coverage of local team.	

E	Date: 98/07/04	Show Preempted: NBC Movie: Tall Tales
	Time: 8 pm	Show Aired: Festival on the 4th
	Reason: Annual broadcast of local July 4th celebration, including the Knoxville Symphony and fireworks display.	

Station Call Sign: WBNS

Affiliation: CBS

A	Date: 98/10/28 Time: 8 pm	Show Preempted: The Nanny, Maggie Winters, To Have and To Hold Show Aired: Election '98/Gubernatorial debate
	Reason: As commitment to an informed viewer in the face of serious elections, WBNS presented the debate in a hotly contested Gubernatorial election	
B	Date: 99/10/16 Time: 8 pm	Show Preempted: Early Edition Show Aired: WBNS, A Family Tradition for 50 Years
	Reason: WBNS presented retrospective of 50 years of local broadcasting in conjunction with station's 50th Anniversary. The show highlighted local broadcast legends and nationally known talent affiliated with WBNS. Names like CBS News' Bob Orr, Former NBC Anchor Faith Daniels, and Comedian Jonathan Winters.	
C	Date: 00/03/31 Time: 8 pm	Show Preempted: Kids Say Darndest Things Show Aired: Angela Pace Profiles
	Reason: WBNS anchor Angela Pace presented half-hour, one-on-one profile of community leaders. These specials have included names like Abigail Wexner, wife of the Limited Brands founded Les Wexner, Ohio's First Lady Hope Taft, and OSU Basketball Coach Jim O'Brien.	
D	Date: 01/09/07 Time: 8:30 pm	Show Preempted: Diagnosis Murder Show Aired: Heart to Heart
	Reason: Partnering with Ohio State Medical Center, WBNS Anchor and Health Reporter, Andrea Cambern, hosted a half hour devoted to the latest in heart health, procedures and research.	
E	Date: 01/09/07 Time: 8 pm	Show Preempted: Diagnosis Murder Show Aired: Buckeye Blitz
	Reason: WBNS profiled the upcoming Ohio State Football Season and introduced Columbus to new coach, Jim Tressell. This was the first opportunity th market had to truly get to know the man that would eventually lead them to a 13-0 season in 2002.	

Station Call Sign: WBRZ

Affiliation: ABC

A	Date: 02/06/01 Time: 8 pm	Show Preempted: Show Aired: Children's Miracle Network Telethon
	Reason: WBRZ airs this telethon yearly to help a local hospital raise money for needy children.	
B	Date: 02/08/28 Time: 8 pm	Show Preempted: My Wife & Kids Show Aired: Town Meeting on Safety
	Reason: Baton Rouge area has a serial killer on the loose, and this program was aired for the safety of our community.	
C	Date: 02/09/01 Time: 12:30 pm	Show Preempted: Munich Games Show Aired: LSU Tiger Football
	Reason: Local sports show kicking off the LSU season in the Baton Rouge area.	
D	Date: 02/10/07 Time: 7 pm	Show Preempted: Whose Line Show Aired: Presidential address
	Reason: The networks did not air this speech, but ABC gave stations a feed, and we aired it for our viewers to see.	
E	Date: 02/10/28 Time: 7 pm	Show Preempted: Whose Line Show Aired: 2002: The Vote Run for the Senate
	Reason: Statewide Senatorial race debate, 5 candidates debating	

Station Call Sign: WJXX

Affiliation:

ABC

A	Date: 00/05/25 Time: 8 pm	Show Preempted: Whose Line Is It Anyway Show Aired: Straight Talk
	Reason: This Jacksonville Jaguars Foundation program addressing teen pregnancy aired on all stations in the market.	
B	Date: 00/06/24 Time: 8 pm	Show Preempted: ABC Sat. Movie Show Aired: Miss Florida Pageant
	Reason: Opportunity to air this beauty pageant with a local contestant.	
C	Date: 01/09/18 Time: 8 pm	Show Preempted: Dharma & Greg Show Aired: Sept. 11 Vigil from the Landing
	Reason: This was a city sponsored 9/11 event to honor those who lost loved ones	
D	Date: 01/05/30 Time: 8 pm	Show Preempted: Whose Line Is It (2) Show Aired: Straight Talk
	Reason: Jaguars Foundation program addressing teen pregnancy aired on all TV stations.	
E	Date: 01/08/16 Time: 8 pm	Show Preempted: Whose Line (2), Millionaire, PrimeTime Thurs. Show Aired: NFL: Jaguars vs. Giants
	Reason: Contract to air Jaguars game on ABC station.	

Station Call Sign: WBTV

Affiliation:

CBS

A	Date: 02/12/05 Time: 11 am	Show Preempted: Price is Right, Soap Operas Show Aired: Live coverage of major winter storm
	Reason: 50% of Charlotte area without power	
B	Date: 02/11/05 Time: 8 pm	Show Preempted: CBS Tues. Primetime Show Aired: Live election coverage
	Reason: Major local and state races	
C	Date: 02/02/02 Time: 8 pm	Show Preempted: CBS Sat. Primetime Show Aired: ACC Basketball--Duke/Clemson
	Reason: WBTV is the primary ACC Basketball affiliate in Charlotte.	
D	Date: 02/07/23 Time: 8 pm	Show Preempted: JAG Show Aired: WBTV News Hurricane Special
	Reason: Public awareness/education about hurricanes	
E	Date: 02/08/19 Time: 8 pm	Show Preempted: King of Queens Show Aired: WBTV News Drought Special
	Reason: Public awareness/education about the severe drought in our viewing area.	

Station Call Sign: WCAX

Affiliation:

CBS

A	Date: 02/10/20 Time: 8 pm	Show Preempted: Becker/Bram & Alice Show Aired: Local Governors Debate
	Reason: To give our viewers an educated look @ Vermont issues.	

B	Date: 1996 Time:	Show Preempted: CBS Sports Spectacular Show Aired: Fox NFL Football
	Reason: We became a secondary affiliate of Fox when CBS didn't get NFL football.	

C	Date: 99/04/18 Time: 11 am	Show Preempted: CBS Religious Special Show Aired: You Can Quote Me
	Reason: Topical public affairs program that addresses issues that affect our community. We also air a half-hour religious program every Saturdays.	

D	Date: 93/02/27 Time: 8 pm	Show Preempted: Dr. Quinn Show Aired: UVM Hockey
	Reason: To give our community a chance to watch the NCAA hockey game at a time that you couldn't get tickets	

E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: WCPO

Affiliation:

ABC

A	Date: 02/01/11 Time: 8 pm	Show Preempted: Who Wants to be a Millionaire Show Aired: The Movement
	Reason: Local scriptwriting competition for African Americans. Story is then produced as a 1 hour movie.	

B	Date: 02/02/10 Time: 5 pm	Show Preempted: Sports Program Show Aired: Visions of Vine Street
	Reason: I-Team investigation of dilapidated downtown neighborhood and plan to revitalize it.	

C	Date: 02/03/20 Time: 8 pm	Show Preempted: According to Jim Show Aired: College Tour
	Reason: A look at the different higher learning facilities in the DMA (colleges, universities, 2 year colleges).	

D	Date: 02/06/18 Time: 9 pm	Show Preempted: Spin City/Spin City Show Aired: Critical Condition
	Reason: A one-hour special investigating why the Cincinnati area is losing doctors due to insurance companies reducing reimbursement rates.	

E	Date: 02/04/08 Time: 8 pm	Show Preempted: Am. Funniest Show Aired: Cincinnati: Building the Future
	Reason: A simulcast with the PBS station. Studio audience and experts discussing solutions to city's riots and unrest.	

Station Call Sign: WKMG

Affiliation:

CBS

A	Date: 02/11/25 Time: 8 pm	Show Preempted: 48 Hours Investigates Show Aired: Holiday Spectacular
	Reason: A 1 hour holiday special from a local mall. Show included lighting of the holiday Christmas Tree.	
B	Date: 02/11/05 Time: 10 pm	Show Preempted: CBS Election Coverage Show Aired: Local 6 Election
	Reason: Covered local and national election results with a larger focus on local elections.	
C	Date: 02/06/26 Time: 8 pm	Show Preempted: 60 Minutes II Show Aired: Concert for Life
	Reason: A one hour special on Lupus to raise awareness and money for the foundation.	
D	Date: 01/03/26 Time: 10 pm	Show Preempted: 48 Hours Show Aired: Problem Solvers
	Reason: Local special from Local 6 news regarding consumer related problems and solutions.	
E	Date: 00/03/14 Time: 8 pm	Show Preempted: JAG Show Aired: Campaign 2000
	Reason: Local coverage of all local, state and national elections.	

Station Call Sign: WCSC

Affiliation:

CBS

A	Date: 02/03/05 Time: 9 pm	Show Preempted: Guardian Show Aired: Billy Graham
	Reason:	
B	Date: 02/06/06 Time: 8 pm	Show Preempted: King of Queens Show Aired: Debate for Governor
	Reason:	
C	Date: 02/09/01 Time: 9 pm	Show Preempted: CBS Sunday Movie Show Aired: MDA Telethon
	Reason:	
D	Date: 01/12/20 Time: 9 pm	Show Preempted: Show Aired: Tournament of Champions
	Reason: Basketball tournament with the College of Charleston	
E	Date: 02/06/13 Time: 8 pm	Show Preempted: Price is Right Special Show Aired: Friends/Seinfeld
	Reason:	

Station Call Sign: WCSH

Affiliation:

NBC

A	Date: 02/10/16 Time: 8 pm	Show Preempted: NBC's Ed Show Aired: Voice of the Voter
	Reason: Maine Gubernatorial debate/forum	
B	Date: 02/10/29 Time: 8 pm	Show Preempted: NBC's Just Shoot Me and The In Laws Show Aired: Voice of the Voter
	Reason: Maine U.S. Senate debate/forum	
C	Date: 02/10/15 Time: 8 pm	Show Preempted: NBC's Just Shoot Me and The In Laws Show Aired: 6 Who Care Awards
	Reason: Local awards program honoring superstar volunteers	
D	Date: 02/10/22 Time: 8 pm	Show Preempted: NBC's Just Shoot Me and The In Laws Show Aired: Voice of the Voter
	Reason: Maine Congressional debates/forum--for district 1	
E	Date: 01/12/11 Time: 8 pm	Show Preempted: NBC's Emeril Show Aired: Watching the Skies
	Reason: Local winter storm preparedness special	

Station Call Sign: WCTI

Affiliation:

ABC

A	Date: 02/08/30 Time: 8 pm	Show Preempted: Home Videos, Whose Line, 20/20 Show Aired: Carolina Panthers football
	Reason: Regional sports interest	
B	Date: 02/08/10 Time: Noon	Show Preempted: ABC Cartoons, Sports, Bond Movie Show Aired: Cystic Fibrosis telethon
	Reason: Annual fundraiser for foundation that funds research to benefit area CF families. This was the 25th year.	
C	Date: Q1 Time: Various	Show Preempted: Various Show Aired: ACC Basketball
	Reason: Station has aired the ACC basketball series since 1984. Preempts primarily weekend sports & some prime time.	
D	Date: 99/09/16 Time: 4 am	Show Preempted: ABC Full Schedule Show Aired: News
	Reason: Continuous coverage of area conditions resulting from Hurricane Floyd and flood.	
E	Date: 94/12/31 Time: 11 am	Show Preempted: Bugs & Tweety Show Aired: All American Football
	Reason: Area football team in playoff.	

Station Call Sign: WCTV

Affiliation: CBS

A	Date: 02/11/20 Time: 9 pm	Show Preempted: Victoria's Secret Show Aired: Two episodes of Frasier
	Reason: Unsuitable for time period	
B	Date: 02/09/27 Time: 8 pm	Show Preempted: CBS Prime Show Aired: Fla. Governors Debate
	Reason: Priority for election information.	
C	Date: 02/09/01 Time: 9 pm	Show Preempted: CBS Prime Show Aired: MDA Telethon
	Reason: Help raise money for good cause!	
D	Date: 02/08/21 Time: 8 pm	Show Preempted: CBS Prime Show Aired: Local Preseason Football Special
	Reason: Local viewer interest	
E	Date: 02/04/06 Time: 10:30 am	Show Preempted: CBS News/Kids Show Aired: Live Bdcst of Tallahassee Springtime Festival Parade
	Reason: Local community interest	

Station Call Sign: WCYB

Affiliation: NBC

A	Date: 00/02/11 Time: 8 pm	Show Preempted: The Pretender Show Aired: Project Family: After School special
	Reason: Local public affairs program	
B	Date: 00/02/28 Time: 8:30 pm	Show Preempted: God, Bob & Devil Show Aired: US Olympic Gold
	Reason: Program content—language	
C	Date: 00/06/05 Time: 8 pm	Show Preempted: Dateline Show Aired: Project Family: Writing Stories
	Reason: Local public affairs program	
D	Date: 00/07/04 Time: 8 pm	Show Preempted: 3rd Rock from Sun Show Aired: Project Family: Planes & Things
	Reason: Local public affairs program	
E	Date: 02/05/27 Time: 4 pm	Show Preempted: NBA Show Aired: Local news
	Reason: Better serve needs of local community	

Station Call Sign: WDBJ

Affiliation:

CBS

A	Date: 02/12/06 Time: 8 pm	Show Preempted: 48 Hours Show Aired: Billy Graham Crusade
	Reason: Billy Graham has long standing viewing heritage in the market (we air Billy Graham approx. 5 times/year)	
B	Date: 02/11/30 Time: 8 pm	Show Preempted: Ice Wars Show Aired: ACC Basketball
	Reason: ACC preeminent basketball conference, season long contract. 25-32 games, prime & weekend, 7-9 prime games per year.	
C	Date: 02/08/10 Time: 7 pm	Show Preempted: Touched by an Angel Show Aired: Local NASCAR race
	Reason: NASCAR is single biggest sporting draw in market. Race is produced locally at local track (usually one race per year)	
D	Date: 01/06/06 Time: 11 am	Show Preempted: Price is Right/Soaps Show Aired: D-Day Special
	Reason: Local coverage of dedication of in market D-Day memorial by President Bush.	
E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: WEHT

Affiliation:

ABC

A	Date: 01/12/08 Time: 6 pm	Show Preempted: Prime Prog. Show Aired: Local telethon
	Reason: Annual telethon to raise money to clothe needy area school aged children	
B	Date: 02/04/14 Time: Noon	Show Preempted: Sports/Various Show Aired: Easter Seals Telethon
	Reason: Annual telethon to raise money for the local rehabilitation center	
C	Date: Time:	Show Preempted: Show Aired:
	Reason:	
D	Date: Time:	Show Preempted: Show Aired:
	Reason:	
E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: WEWS

Affiliation:

ABC

A	Date: 00/08/24 Time: 8 pm	Show Preempted: Whose Line Is It Anyway Show Aired: High School Sports Preview
	Reason: Special show to kickoff high school sports season	
B	Date: 01/01/06 Time: 10 pm	Show Preempted: Network Movie Show Aired: Our Father
	Reason: Drama special featuring a script written by the winner of a contest to help African American writers with local area actors.	
C	Date: 00/12/15 Time: 8 pm	Show Preempted: Two Guys and A Girl Show Aired: Inside the Deal
	Reason: Local special on the Cleveland Indians' bid to keep Manny Ramirez on the team. Shows how big money deals are put together.	
D	Date: 01/01/17 Time: 8 pm	Show Preempted: Two Guys and A Girl Show Aired: Cleveland Auto Show Preview
	Reason: Preview of annual Cleveland Auto Show which contributes to local charities.	
E	Date: 01/04/23 Time: 10 pm	Show Preempted: Vanished Show Aired: Town Hall Meeting
	Reason: Local special examining whether Cleveland voters should approve a bond issue to improve conditions in Cleveland's public schools.	

Station Call Sign: WFAA

Affiliation:

ABC

A	Date: 91/04/15 Time: 7 pm	Show Preempted: MacGyver Show Aired: Texans
	Reason: Community interest	
B	Date: 93/04/26 Time: 7 pm	Show Preempted: FBI: Untold Stories/American Detective Show Aired: Visions of Africa
	Reason: Community interest	
C	Date: 93/10/12 Time: 9 pm	Show Preempted: NYPD Blue Show Aired: Primetime Texas
	Reason: Unacceptable network content (multiple broadcasts preempted)	
D	Date: 97/12/08 Time: 7 pm	Show Preempted: Timecop Show Aired: Dale Hansen MNF Special
	Reason: Greater local interest (lead-in to Dallas game)	
E	Date: 99/03/25 Time: 7 pm	Show Preempted: Funniest Home Videos Show Aired: Weatherminds: Surviving Texas Weather
	Reason: Community interest	

Station Call Sign: WFIE

Affiliation:

NBC

A	Date: labor day Time: Various	Show Preempted: Various Show Aired: MDA Labor Day Telethon
	Reason: Annual Jerry Lewis MDA Telethon community involvement	
B	Date: 02/03/04 Time: 7 pm	Show Preempted: NBC Prime Show Aired: St. Jude Special
	Reason: Raise funds for St. Jude Hospital generate revenue	
C	Date: 02/01/20 Time: 7 pm	Show Preempted: NBC Prime Show Aired: Univ. of Evansville Basketball
	Reason: To provide viewers with coverage of their local college team. Revenue.	
D	Date: 1997 & 2000 Time: 7 pm	Show Preempted: NBC Prime Show Aired: Tornado telethon, Flood telethon
	Reason: To raise funds for victims of tornado and flood. Community involvement	
E	Date: July 4th Time: 9 pm	Show Preempted: NBC Prime Show Aired: Fireworks show
	Reason: Annual telecast of community July 4th celebration. Community involvement	

Station Call Sign: WFMJ

Affiliation:

NBC

A	Date: 02/09/21 Time: 8 pm	Show Preempted: NBC Saturday Prime Show Aired: Youngstown State football game
	Reason: Broadcast of YSU vs. Western Kentucky football game	
B	Date: 02/06/02 Time: 8 am	Show Preempted: Sunday Today, Meet the Press Show Aired: Children's Miracle Network telethon
	Reason: To benefit local children's hospital. Telethon ran for 10 1/2 hours--mostly during local pgm. Time.	
C	Date: 02/07/30 Time: 1 pm	Show Preempted: Days of our Lives Show Aired: Breaking local news
	Reason: Congressman Trafficant sentence announcement--live coverage from Cleveland	
D	Date: 98/09/12 Time: 6:30 pm	Show Preempted: NBC News, Saturday Prime Show Aired: Youngstown St. football
	Reason: Broadcast of YSU vs. Kent State game. Live from Kent Ohio.	
E	Date: 99/10/02 Time: 6:30 pm	Show Preempted: NBC News, Saturday Prime Show Aired: Youngstown St. football
	Reason:	

Station Call Sign: WFMY

Affiliation:

CBS

A	Date: 02/08/27 Time: 8 pm	Show Preempted: JAG Show Aired: 2 Those Who Care
	Reason: This program honors 10 people in our community who have helped others through their volunteer work.	
B	Date: 02/10/19 Time: 3:30 pm	Show Preempted: NCAA Football: Ole Miss @ Alabama Show Aired: U.S. Senatorial debate: Dole vs. Boles
	Reason: Did not air football game so we would not join the live debate in progress if football ran over.	
C	Date: 01/12/08 Time: 1 pm	Show Preempted: CBS Sports Spectacular, Nature Valley Alpine Cup Show Aired: Greensboro Jaycees Holiday Parade
	Reason: Local parade through downtown Greensboro. This parade has been a tradition for over 30 years.	
D	Date: 02/01/31 Time: 9 pm	Show Preempted: CSI & The Agency Show Aired: ACC Basketball: Duke @ UNC
	Reason: A very important local sports event between two of the most respected colleges in the nation.	
E	Date: 02/11/23 Time: 1 pm	Show Preempted: Franklin Templeton Shark Shoot-Out Show Aired: ACC Football: UNC @ Duke
	Reason: We aired a local sports event instead of the third round of a golf match. The fourth round aired the next day.	

Station Call Sign: WFSB

Affiliation:

CBS

A	Date: Time:	Show Preempted: Show Aired:
	Reason:	
B	Date: Time:	Show Preempted: Show Aired:
	Reason:	
C	Date: Time:	Show Preempted: Show Aired:
	Reason:	
D	Date: Time:	Show Preempted: Show Aired:
	Reason:	
E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: WFTS

Affiliation:

ABC

A	Date: 99/06/03	Show Preempted: John Stossel Special
	Time: 10 pm	Show Aired: Stormwatch '99
	Reason: News weather special to alert viewers on the hurricane season for 1999	
B	Date: 00/06/24	Show Preempted: ABC Sat. Night Movie
	Time: 8 pm	Show Aired: Miss Florida Pageant
	Reason: Aired coverage of 2000 Miss Florida Pageant	
C	Date: 02/02/28	Show Preempted: Whose Line Is It Anyway
	Time: 8 pm	Show Aired: 28 Investigates
	Reason: A look at our top investigative stories from the past quarter.	
D	Date: 01/08/20	Show Preempted: Sabrina: Teen Age Witch, Boy Meets World
	Time: 9 pm	Show Aired: The Millennium Project
	Reason: A show to alert viewers concerning changes from 1999 to 2000 and the potential problems that might occur.	
E	Date: 02/09/01	Show Preempted: The Practice, ABC Daytime Programming
	Time: 10 pm	Show Aired: Jerry Lewis telethon
	Reason: Aired annual Jerry Lewis telethon to raise money for MDA, both nationally and locally.	

Station Call Sign: WGAL

Affiliation:

NBC

A	Date: 00/06/03	Show Preempted: NBC Movie of the Week
	Time: 9 pm	Show Aired: Children's Miracle Network telethon
	Reason: Raise money for Children's Hospital in Hershey	
B	Date: 98/05/25	Show Preempted: Caroline in City, Naked Truth
	Time: 9 pm	Show Aired: 1230 Live: SS United States
	Reason: Air a news special of local interest	
C	Date: 97/12/05	Show Preempted: Players
	Time: 8 pm	Show Aired: Billy Graham Crusade
	Reason: Air a religious special	
D	Date: 95/10/27	Show Preempted: Unsolved Mysteries
	Time: 8 pm	Show Aired: PA Supreme Court Forum
	Reason:	
E	Date: 93/12/14	Show Preempted: Saved by Bell, Getting By
	Time: 8 pm	Show Aired: WGAL Special: Domestic Violence
	Reason:	

Station Call Sign: WGBA

Affiliation:

NBC

A	Date: 02/07/30	Show Preempted: Spy TV, Frasier, Scrubs, Dateline
	Time: 7:30 pm	Show Aired: Breaking weather
	Reason: Severe weather coverage	

B	Date: 01/03/05	Show Preempted: Dateline
	Time: 7 pm	Show Aired: Billy Graham
	Reason:	

C	Date: 01/03/07	Show Preempted: Ed
	Time: 7 pm	Show Aired: Billy Graham
	Reason:	

D	Date: 01/06/04	Show Preempted: Dateline
	Time: 7 pm	Show Aired: Billy Graham
	Reason:	

E	Date: 01/12/04	Show Preempted: NBC Special
	Time: 7 pm	Show Aired: Billy Graham
	Reason:	

Station Call Sign: WGBC

Affiliation:

NBC

A	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

B	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

C	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: WGNO

Affiliation:

ABC

A	Date: 02/10/28	Show Preempted: Drew Carey/Whose Line
	Time: 7 pm	Show Aired: Senate Debate
	Reason: Debate (state-wide)	
B	Date: 02/07/26	Show Preempted: Whose Line
	Time: 8 pm	Show Aired: Surviving The Storm
	Reason: Hurricane survival info	
C	Date: 02/02/02	Show Preempted: ABC Movie
	Time: 7 pm	Show Aired: Mayor's Election Coverage
	Reason: Election returns	
D	Date: 01/12/17	Show Preempted: Who Wants/Millionaire
	Time: 7 pm	Show Aired: Inside Saints
	Reason: Recap of Saints season	
E	Date: Fall 1996	Show Preempted: Dangerous Minds
	Time: 7 pm	Show Aired: Monday Night Sports
	Reason: Weekly local sports program (produced by WGNO)	

Station Call Sign: WHAG

Affiliation:

NBC

A	Date: 01/04/14	Show Preempted: Sports
	Time: Noon	Show Aired: Parent/Child Telethon
	Reason: Annual fundraiser to help raise awareness of child abuse	
B	Date: 02/11/05	Show Preempted: Tonight Show
	Time: 11:30 pm	Show Aired: NBC 25 Nightnews Election Results
	Reason: Election results	
C	Date: 98/03/14	Show Preempted: Prime
	Time: 7 pm	Show Aired: WV HS Basketball champ.
	Reason: Local sports	
D	Date: 95/01/19	Show Preempted: Various News/Nightly News
	Time: Noon	Show Aired: UCP telethon
	Reason: Fundraiser	
E	Date: 92/03/04	Show Preempted: Meet the Press, Sports
	Time: 9 am	Show Aired: Easter Seals telethon
	Reason: Fundraiser	

Station Call Sign: WHAS

Affiliation:

ABC

A	Date: 02/06/01 Time: 1:30 pm	Show Preempted: All network & local Show Aired: WHAS Crusade for Children
	Reason: The WHAS Crusade for Children is an incredible local charity in its 50th year raising over \$6 million/year.	
B	Date: 02/04/20 Time: 10 am	Show Preempted: All network & local Show Aired: Thunder Over Louisville
	Reason: Aired this huge local event. The only local station to air the largest fireworks show in North America, also Ky. Derby Festival opening events.	
C	Date: 02/09/03 Time: 9 pm	Show Preempted: According to Jim Show Aired: WHAS Tribute to Valley Sports
	Reason: Our local little league team, Valley Sports, won the Little League World Series. This primetime special was a tribute to this team.	
D	Date: 02/11/29 Time: 8 pm	Show Preempted: Amer. Funniest Home Videos Show Aired: Light Up Louisville
	Reason: Aired coverage of this local holiday special, marking the kickoff of the holiday season locally.	
E	Date: 02/10/30 Time: 10 pm	Show Preempted: MDs Show Aired: WHAS Political News Special
	Reason: Provided news and information regarding local and national candidates in the November elections.	

Station Call Sign: WHBF

Affiliation:

CBS

A	Date: 99/02/27 Time: 9 pm	Show Preempted: Walker, Texas Ranger Show Aired: 1999 Variety Club Telethon
	Reason: Telethon--Variety Club Children's Charity raised \$3+ million statewide in Iowa. Variety Club serves capital needs of children's charitable non-profit organizations.	
B	Date: Time:	Show Preempted: Show Aired:
	Reason:	
C	Date: Time:	Show Preempted: Show Aired:
	Reason:	
D	Date: Time:	Show Preempted: Show Aired:
	Reason:	
E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: WHIO

Affiliation:

CBS

A	Date: 01/03/19 Time: 8 pm	Show Preempted: King of Queens/Yes Dear/Raymond/Becker Show Aired: Univ. of Dayton NIT Game
	Reason: NIT tournament game featuring local university	
B	Date: 01/10/07 Time: 5 pm	Show Preempted: CBS Sports Show Aired: Dayton Mayoral Debate
	Reason: We produced and aired the only televised mayoral debate in the 2001 election.	
C	Date: 01/12/26 Time: 8 pm	Show Preempted: 60 Minutes II Show Aired: 2001: The Year that Changed the World Forever
	Reason: A station produced, year-end special. It was produced in partnership with WHIO-TV and the Dayton Daily News.	
D	Date: 02/04/28 Time: 1 pm	Show Preempted: CBS Sports Show Aired: NewsCenter 7's Republican Debate
	Reason: Republican Primary Debate for the Congressional District 3.	
E	Date: 02/10/20 Time: 2 pm	Show Preempted: CBS Sports Show Aired: WHIO Reports School Levy
	Reason: This was a critical \$600 million levy for the Dayton Public Schools. WHIO-TV produced a special round-table discussion featuring various community and school district leaders.	

Station Call Sign: WHOI

Affiliation:

ABC

A	Date: 01/08/22 Time: 7 pm	Show Preempted: Wife & Kids Show Aired: Paid Pgm
	Reason:	
B	Date: 02/09/28 Time: 8 pm	Show Preempted: Thieves Show Aired: Town Meeting
	Reason: Local news roundtable discussion	
C	Date: Time:	Show Preempted: Show Aired:
	Reason:	
D	Date: Time:	Show Preempted: Show Aired:
	Reason:	
E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: WHP

Affiliation:

CBS

A	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	
B	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	
C	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	
D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	
E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: WHTM

Affiliation:

ABC

A	Date: 01/04/06	Show Preempted: ABC Network
	Time: 8 pm	Show Aired: Fighting Cancer: New Hope in Hershey
	Reason: Spotlighted work & recent groundbreaking advancements in cancer research at the Gittlen Cancer Institute, part of Hershey Medical Center.	
B	Date: 01/03/12	Show Preempted: ABC Network
	Time: 7 pm	Show Aired: Leukemia & Lymphoma telethon
	Reason: To educate our audience about the work & programs of the U.S. Viewers were able to see how lives were affected by their generous donations.	
C	Date: 99/10/28	Show Preempted: ABC Network
	Time: 8:30	Show Aired: College tour
	Reason: This half hour show showcased area college/technical schools and offered valuable information in the areas of financial aid, etc.	
D	Date: 99/07-02/07	Show Preempted: ABC Network
	Time: 7 pm	Show Aired: Big 33 Championship Football
	Reason: Best of Ohio meets the best of Pennsylvania in this annual classic. Many of these kids go on to have great college and NFL careers.	
E	Date: 99/08-02/08	Show Preempted: ABC Network
	Time:	Show Aired: Jake Gittlen Memorial Golf Tournament
	Reason: This popular amateur tournament brings together some of the best players in our region plus helps to raise funds for the Gittlen Cancer Research Institute.	

Station Call Sign: WICU

Affiliation:

NBC

A	Date: 01/05/29	Show Preempted: Fighting Fitzgeralds/Day
	Time: 8 pm	Show Aired: Heart Health Special by local hospital
	Reason: Public service health program responsive to community need.	
B	Date: 01/04/06	Show Preempted: Dateline NBC
	Time: 8 pm	Show Aired: SeaWolves Home Opener
	Reason: Local baseball team home opener televised live each year.	
C	Date: 01/06/02	Show Preempted: NBC Movie
	Time: 8 pm	Show Aired: Children's Miracle Network Telethon
	Reason: Annual fundraising Telethon benefiting local hospital.	
D	Date: 99/09/13	Show Preempted: Suddenly Susan
	Time: 8 pm	Show Aired: U.S. Brig Niagara: The Legend Lives
	Reason: The U.S. Brig Niagara is berthed in Erie--this was a half-hour educational special done aboard the brig.	
E	Date: 01/12/05	Show Preempted: Ed
	Time: 8 pm	Show Aired: Billy Graham Crusade
	Reason: Quarterly contractual arrangement.	

Station Call Sign: WIFR

Affiliation:

CBS

A	Date: 01/01/16	Show Preempted: JAG, 60 Minutes II, Judging Amy
	Time: 7 pm	Show Aired: Rockford Rescue Mission Telethon
	Reason: Raise funds for local homeless shelter	
B	Date: 01/04/04	Show Preempted: CBS Sitcoms
	Time: 7 pm	Show Aired: Golden Apple Awards Show
	Reason: Highlights from banquet honoring outstanding Rockford teachers	
C	Date: 99/08/20	Show Preempted: Unsolved Mysteries
	Time: 8 pm	Show Aired: WIFR Sports Special: Chicago Bears/GB Packers
	Reason: Local sports special looking at upcoming seasons of local favorites (& rivals) Bears & Packers	
D	Date: 99/08/31	Show Preempted: JAG
	Time: 7 pm	Show Aired: WIFR Special - When Seconds Count
	Reason: This special looked at what needs to be done when someone is having a heart attack and seconds count.	
E	Date: 99/09/16	Show Preempted: Diagnosis Murder
	Time:	Show Aired: WIFR Spec: A Night for the Coronade Theater
	Reason: Fundraiser for the restoration of historic theater in Rockford.	

Station Call Sign: WIS

Affiliation:

NBC

A	Date: 02/01/05 Time: 8 pm	Show Preempted: NBC Primetime Show Aired: UNCF Telethon
	Reason: Presented significant program for African-American community	
B	Date: 02/03/04-05 Time: 8 pm	Show Preempted: Fear Factor/Frasier Show Aired: Billy Graham Crusade
	Reason: Presented major religious programming	
C	Date: 02/03/08 Time: 10 pm	Show Preempted: Law & Order Show Aired: SEC BB Tournament
	Reason: Presented University of South Carolina basketball team in SEC tournament	
D	Date: 02/09/29 Time: 8 am	Show Preempted: Ryder Cup Show Aired: SEC Football
	Reason: Carried SEC game. WIS wished to carry Ryder Cup in Saturday AM, but was prevented by NBC.	
E	Date: 02/06/01 Time: 8 pm	Show Preempted: NBC Primetime Show Aired: Children's Miracle Network Telethon
	Reason:	

Station Call Sign: WISC

Affiliation:

CBS

A	Date: 02/11/05 Time: 9 pm	Show Preempted: Prime Show Aired: Election coverage
	Reason: Local election coverage	
B	Date: 02/08/24 Time: 6 pm	Show Preempted: Sat Prime Show Aired: Packer preseason
	Reason: We have Packer preseason games	
C	Date: 02/08/31 Time: Various	Show Preempted: Sat SEC Football Show Aired: Big 10 Football
	Reason: Contract w/ESPN--locally important vs. SEC games	
D	Date: 02/11/03 Time: 9:30 am	Show Preempted: Face the Nation Show Aired: Governor's debate
	Reason: Local importance	
E	Date: 02/09/10 Time: 9 pm	Show Preempted: Prime Show Aired: Local election coverage
	Reason: Hot primary election	

Station Call Sign: WITN

Affiliation:

NBC

A	Date: 02/10/26 Time: 2 pm	Show Preempted: Breeders Cup Show Aired: East Carolina Football
	Reason: Coverage of local college team at top-20 ranked Louisville instead of horse race (no horse racing within 250 mile radius of market)	
B	Date: 02/06/01 Time: 9 pm	Show Preempted: Movie/WNBA/French Open Show Aired: Children's Miracle Network
	Reason: Live fundraising telethon to benefit local Children's Hospital – preempted movie repeat, early round coverage of WNBA & French Open Tennis.	
C	Date: 01/04/11 Time: 2 pm	Show Preempted: Passions Show Aired: Live News
	Reason: Live coverage of arrival of President Bush to eastern North Carolina for major speech at East Carolina University	
D	Date: 99/09/18 Time: Continuous	Show Preempted: Various Show Aired: Continuous Flood coverage
	Reason: Live continuous coverage of flooding conditions that took 47 lives and caused \$ millions in property damage	
E	Date: 99/09/16 Time: 7:10 am	Show Preempted: Today/Daytime Show Aired: Hurricane coverage
	Reason: Live coverage as Hurricane Fran made landfall in eastern North Carolina	

Station Call Sign: WJAC

Affiliation:

NBC

A	Date: 02/09/02 Time: 2:30 pm	Show Preempted: Passions/Days/Nightly Show Aired: MDA Telethon
	Reason: Raise local \$ for MDA	
B	Date: 02/10/26 Time: 12 noon	Show Preempted: Breeders Cup Show Aired: Johnstown Halloween Parade
	Reason: Local civic pride	
C	Date: 02/08/05 Time: 7:30	Show Preempted: Fear Factor/Dog Eat Dog Show Aired: AAABA Baseball game
	Reason: Local sports tradition	
D	Date: 02/07/04 Time: 9 pm	Show Preempted: Macy's Fireworks Show Aired: Local fireworks
	Reason: Local tradition	
E	Date: 02/07/27 Time: 11:30 pm	Show Preempted: Sat. Night Live Show Aired: Quecreek Mine Disaster/Rescue Coverage
	Reason: News live coverage	

Station Call Sign: WJBF

Affiliation:

ABC

A	Date: 02/01/05 Time: 7:30 pm	Show Preempted: ABC Prime Show Aired: UNCF Telethon
	Reason: Fundraiser for UNCF/Paine College to provide scholarships for deserving students	
B	Date: 01/09/03 Time: 5:30 am	Show Preempted: Good Morning America, ABC Soaps Show Aired: MDA Telethon
	Reason: National telethon to raise funds to continue research to find a cure for Muscular Dystrophy	
C	Date: 00/07/29 Time: 7:30 pm	Show Preempted: ABC Prime Show Aired: Atlanta Falcons preseason game
	Reason: Local interest in NFL Atlanta franchise	
D	Date: 99/06/17 Time: 8 pm	Show Preempted: ABC Prime Show Aired: Golden Apple Awards
	Reason: Locally produced program honoring teachers who were highlighted during the year on local news programs for excellence in the classroom.	
E	Date: 98/09/17 Time: 7 pm	Show Preempted: ABC Prime Show Aired: Volunteer-A-Thon
	Reason: Locally produced program featuring non-profit organizations soliciting volunteer hours instead of monetary contributions.	

Station Call Sign: WJSU

Affiliation:

ABC

A	Date: 00/01/08 Time: 7 pm	Show Preempted: Fifth Element Show Aired: UNCF Special
	Reason:	
B	Date: 00/03/09 Time: 7 pm	Show Preempted: Whose Line Is It Show Aired: St. Jude's
	Reason:	
C	Date: 00/06/30 Time: 7 pm	Show Preempted: Boy Meets World Show Aired: Alabama Sports Festival
	Reason:	
D	Date: 01/06/29 Time: 7 pm	Show Preempted: Making the Band Show Aired: 2001 Alabama Sports Festival
	Reason:	
E	Date: 01/10/25 Time: 7 pm	Show Preempted: Whose Line Is It Anyway Show Aired: Cancer: A New Horizon
	Reason: Program hosted by news anchor recovering from breast cancer. Program to recognize Breast Cancer Awareness month.	

Station Call Sign: WKBT

Affiliation:

CBS

A	Date: 02/01/02	Show Preempted: I Love Lucy Special
	Time: 7pm	Show Aired: Wi @ Iowa basketball
	Reason: Commitment to ESPN regional	

B	Date: 00/04/14	Show Preempted:
	Time: 7 pm	Show Aired: Local severe weather special
	Reason: This is a special program that we produce annually	

C	Date: 00/08/04	Show Preempted:
	Time: 7 pm	Show Aired: Green Bay/NY Jets Pre-season
	Reason: We have a contract to air the Packer pre-season games	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: WKBW

Affiliation:

ABC

A	Date: 01/03/03	Show Preempted: ABC Sat. Night Movie & Sunday afternoon sports
	Time: 8 pm	Show Aired: Variety Club telethon
	Reason: Telethon to support Children's Hospital & other children's charities	

B	Date: 01/06/06	Show Preempted: ABC Programming
	Time: 8 pm	Show Aired: Taking Back the Streets
	Reason: Local special--public affairs--community oriented	

C	Date: 98/03/09	Show Preempted: ABC Network
	Time: 8 pm	Show Aired: Hospice Special
	Reason: Public service show on the Hospice program available to community	

D	Date: 99/08/14	Show Preempted: Network
	Time: 9 pm	Show Aired: Buffalo Bills game
	Reason: Pre-season football game	

E	Date: 97/11/17	Show Preempted: Network
	Time: 8:30 pm	Show Aired: Eyewitness Sports Primetime
	Reason: Local special that aired before a Monday Night football game in which the Buffalo Bills were playing.	

Station Call Sign: WVLT

Affiliation:

CBS

A	Date: 02/01/09	Show Preempted: Michael Jackson special
	Time: 8 pm	Show Aired: TN/FL Basketball
	Reason: To offer local university sports broadcast	
B	Date: 02/01/30	Show Preempted: Becker/Becker
	Time: 9 pm	Show Aired: St. Judes/Story of Hope
	Reason: To help St. Judes raise medical funds	
C	Date: 02/06/07	Show Preempted: JAG
	Time: 8 pm	Show Aired: Billy Graham
	Reason: To offer popular religious program	
D	Date: 02/08/01	Show Preempted: The Agency
	Time: 10 pm	Show Aired: Local election coverage
	Reason: To report local election returns	
E	Date: 02/09/02	Show Preempted: Yes Dear/Raymond
	Time: 8:30 pm	Show Aired: Boomsday
	Reason: To broadcast one of the largest fireworks displays in the Southeast	

Station Call Sign: WKYC

Affiliation:

NBC

A	Date: 99/08/14	Show Preempted: NBC Movie
	Time: 8 pm	Show Aired: Browns pre-season football
	Reason: WKYC pre-empted NBC movie and various programming to air all Cleveland Browns pre-season football games in 1999, 2000, 2001 and 2002.	
B	Date: 00/04/17	Show Preempted: Dateline/Law & Order SVU
	Time: 9 pm	Show Aired: Channel 3 Theater
	Reason: Usually 2 times during the year WKYC airs a local movie in primetime.	
C	Date: 00/01/08	Show Preempted: The Pretender
	Time: 8 pm	Show Aired: Dateline Cleveland
	Reason: WKYC pre-empted the network to air a locally produced special on timely Cleveland issues.	
D	Date: 98/03/30	Show Preempted: House Rules/Suddenly Susan
	Time: 8 pm	Show Aired: Tribe Fever
	Reason: Annually WKYC aired a locally produced sports special at Cleveland Indians training camp.	
E	Date: 98/07/04	Show Preempted: NBC Movie
	Time: 9 pm	Show Aired: 4th of July Special
	Reason: Annually WKYC pre-empted the network on July 4th to air local/live community program.	

Station Call Sign: WKYT

Affiliation:

CBS

A	Date: 98/03/30 Time: 8 pm	Show Preempted: Cosby/Raymond Show Aired: Wildcat Road to Texas
	Reason: Kentucky playing Utah in the NCAA Basketball Champ. (Ky. won).	
B	Date: 99/10/22 Time: 8 pm	Show Preempted: Kids Say Darndest Things Show Aired: Ky's Miss America
	Reason: First time ever Kentucky won Miss America. Heather French from Lexington--the special featured her and her platform for Veterans.	
C	Date: 00/12/12 Time: 8 pm	Show Preempted: JAG Show Aired: Ky Christmas Chorus
	Reason: Churches, schools & organizations here in Lexington fill Rupp Arena to sing in the holidays. Hosted by KYT anchors and Lexington Philharmonic.	
D	Date: 01/08/31 Time: 8 pm	Show Preempted: That's Life Show Aired: Cats and Cards: Battle of Bluegrass
	Reason: Huge rivalry and interest in University of Ky & Univ. of Louisville Basketball. Preview of next day's basketball game.	
E	Date: 02/10/02 Time: 8 pm	Show Preempted: 60 Minutes II Show Aired: Mayoral debate
	Reason: Huge viewer interest in the two candidates running for Lexington Mayor.	

Station Call Sign: WLBT

Affiliation:

NBC

A	Date: 01/11/24 Time: 9 am	Show Preempted: TNBC Show Aired: Tornado coverage
	Reason: Severe weather coverage	
B	Date: 02/07/06 Time: 8 pm	Show Preempted: NBC Movie Show Aired: Miss Mississippi
	Reason: Local interest in annual scholarship pageant	
C	Date: 00/12/15 Time: Noon	Show Preempted: NBC Sports Figure Skating Show Aired: Annual Toy Drive
	Reason: Annual toy drive, collected more than 5,000 toys for Toys for Tots	
D	Date: Time:	Show Preempted: Show Aired:
	Reason:	
E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: WLBZ

Affiliation:

NBC

A	Date: 02/10/16	Show Preempted: Ed
	Time: 8 pm	Show Aired: Voice of the Voter
	Reason: Maine Gubernatorial forum	
B	Date: 02/10/29	Show Preempted: Just Shoot Me/In-Laws
	Time: 8 pm	Show Aired: Voice of the Voter
	Reason: Maine U.S. Senate Debate	
C	Date: 02/05/20	Show Preempted: Dateline
	Time: 8 pm	Show Aired: 2 Those Who Care
	Reason: Volunteer recognition program	
D	Date: 01/12/11	Show Preempted: Emeril
	Time: 8 pm	Show Aired: Watching the Skies
	Reason: Local winter storm preparedness	
E	Date: 02/10/08	Show Preempted: Just Shoot Me/In Laws
	Time: 8 pm	Show Aired: Voice of the Voter
	Reason: 2nd Congressional District Debate	

Station Call Sign: WLKY

Affiliation:

CBS

A	Date: 97/10/07	Show Preempted: JAG
	Time: 8 pm	Show Aired: Wed. Child Adopt
	Reason: Station produces annual Wednesday's Child Adopt-a-thon special to raise monies for Wed. Child, Inc., which works to place special-needs children in adoptive homes. Profiles of children are highlighted and success stories w/adoption are shared.	
B	Date: 98/10/06	Show Preempted: JAG
	Time: 8 pm	Show Aired: Bell Awards
	Reason: Station produces annual special to recognize the outstanding volunteer service of local citizens.	
C	Date: 99/12/17	Show Preempted: Kids Say Darndest, Candid Camera
	Time: 8 pm	Show Aired: Battle of Bluegrass
	Reason: Sports special highlighting rivalry between U of K and U of L.	
D	Date: 00/04/14	Show Preempted: Kids Say Darndest, Cosby
	Time: 8 pm	Show Aired: Derby Festival Spec.
	Reason: Special highlighting the 80+ community events surrounding the running of The Kentucky Derby.	
E	Date: 01/06/18	Show Preempted: Diagnosis Murder
	Time: 8 pm	Show Aired: Dreambuilders
	Reason: Dreambuilders Celebration provides opportunities in the fields of broadcasting, journalism and the arts by soliciting scripts for consideration to be made into a television movie. The 2001 winner was a local playwright from Louisville, KY.	

Station Call Sign: WLNE

Affiliation:

ABC

A	Date: 02/11/05 Time: 9 pm	Show Preempted: Life with Bonnie/Less than Perfect/ABC News Show Aired: Local election coverage
	Reason: To provide local coverage of the election results to area viewers. This was a very important year for Rhode Island and Massachusetts.	
B	Date: 02/09/10 Time: 9 pm	Show Preempted: Various ABC Show Aired: Local election coverage
	Reason: To provide local returns and commentary on the critical Rhode Island primary.	
C	Date: 02/09/09 Time: 8 pm	Show Preempted: Drew Carey/Whose Line Show Aired: Patriot's Preview
	Reason: Local sports show featuring the new stadium's debut and New England Patriot's first game since winning the Super Bowl!	
D	Date: 02/09/01 Time: 9 pm	Show Preempted: Alias/The Practice Show Aired: MDA Telethon
	Reason: Our 9th annual presentation of the Muscular Dystrophy Telethon, benefiting families and children in our DMA.	
E	Date: 02/06/20 Time: 9 pm	Show Preempted: ABC Movie Show Aired: Local Movie: Captain Ron
	Reason: To provide more inventory for our local advertisers to reach their customers!	

Station Call Sign: WLNS

Affiliation:

CBS

A	Date: Time:	Show Preempted: Show Aired: Political Debate
	Reason: Congressional Race	
B	Date: Time:	Show Preempted: Show Aired: Town Hall Meeting
	Reason: Local racism issues	
C	Date: Time:	Show Preempted: Show Aired: Sports special
	Reason: Local team in NCAA basketball championship	
D	Date: Time:	Show Preempted: Show Aired:
	Reason:	
E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: WLTZ

Affiliation:

NBC

A	Date: 01/02/07	Show Preempted: Tonight Show
	Time: 2 am	Show Aired: Access Hollywood
	Reason: Network repeats	

B	Date: 01/02/07	Show Preempted: Tonight Show
	Time: 2:30 am	Show Aired: Grace Under Fire
	Reason: Network repeats	

C	Date: 01/02/07	Show Preempted: Later
	Time: 3 am	Show Aired: Men are From Mars
	Reason: Network repeats	

D	Date: 01/02/08	Show Preempted: Tonight Show
	Time: 2 am	Show Aired: Access Hollywood
	Reason: Network repeats	

E	Date: 01/02/08	Show Preempted: Tonight Show
	Time: 2:30 am	Show Aired: Grace Under Fire
	Reason: Network repeats	

Station Call Sign: WLWT

Affiliation:

NBC

A	Date: 00/07/22	Show Preempted: World's Most Famous Videos
	Time: 8 pm	Show Aired: Cooperstown Inductions
	Reason: Several Cincinnati Reds players and broadcasters were being inducted into MLB Hall of Fame/Significant local interest	

B	Date: 01/04/24	Show Preempted: In Style Celebrity Mom
	Time: 8 pm	Show Aired: Organ Donation/Education Special
	Reason: Increase local awareness of issues surrounding organ donation and education	

C	Date: 01/10/30	Show Preempted: Emeril/Three Sisters
	Time: 8 pm	Show Aired: Cincinnati Mayoral Debate
	Reason: Live coverage of debate/Cincinnati's first "strong" mayoral election in 50+ years	

D	Date: 02/05/11	Show Preempted: NBC Saturday Night Movie
	Time: 8 pm	Show Aired: Channel 5 - 155 Auto Race
	Reason: First live local produced stock car race in tri-state history	

E	Date: 02/09/18	Show Preempted: Ed
	Time: 8 pm	Show Aired: Cincinnati Cheetah Connection
	Reason: Educational/highlighted unique relationship between Cincinnati, the Cincinnati Zoo and the National Cheetah Conservation effort in Nambibia Africa	

Station Call Sign:

WMAZ

Affiliation:

CBS

A	Date: 94/07/05-06 Time: 11 am	Show Preempted: CBS Line Up Show Aired: WMAZ Flood coverage
	Reason: Hurricane Alberto released a torrent of rain on Central Georgia causing fatal floods. Macon's Mayor told the community lives were saved because of WMAZ's coverage.	
B	Date: 98/10/17 Time: 8 pm	Show Preempted: CBS Prime line up Show Aired: Gubernatorial forum
	Reason: WMAZ set up and broadcast Gubernatorial Debate from the Georgia National Fair to help voters make the most informed decision	
C	Date: Various Time: 6:30 pm	Show Preempted: CBS Evening News Show Aired: WMAZ Close Up
	Reason: For approximately 25 yrs., WMAZ aired Central Georgia's only weekly public affairs program, dealing with issues of concern to the community. The program now airs weekend afternoons when sports does not preempt.	
D	Date: 99/12/31 Time: 11:30 pm	Show Preempted: Letterman Show Aired: WMAZ Y2K Special
	Reason: When Y2K had the world in a frenzy, WMAZ stayed with our viewers live through the New Year to reassure them as we entered the next century.	
E	Date: Sats. Time: 9 am	Show Preempted: CBS Nick Jr. Show Aired: The Magic Club
	Reason: WMAZ believes strongly in the value of children's programming and produces a half-hour program weekly that features a local magician and Central Georgia children in the studio audience.	

Station Call Sign: WMGT

Affiliation:

NBC

A	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	
B	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	
C	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	
D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	
E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: WMTV

Affiliation:

NBC

A	Date: 98/09/07	Show Preempted: NBC Movie
	Time: 7 pm	Show Aired: Decision 98
	Reason: Political programming--highlighted local races/referendum. Included candidate profiles and interviews.	
B	Date: 98/12/09	Show Preempted: Working
	Time: 8:30 pm	Show Aired: Share Your Holidays
	Reason: Kick-off for station-sponsored food drive. (Public service campaign done annually by WMTV.)	
C	Date: 99/04/28	Show Preempted: World's Most Amazing Videos
	Time: 8 pm	Show Aired: Safe Kids
	Reason: Local news program produced in response to events like Columbine shootings.	
D	Date: 01/05/29	Show Preempted: Spy TV
	Time: 7 pm	Show Aired: Stop Picking on Me
	Reason: Local news program--town meeting format--dealing with problem of school bullying.	
E	Date: 97/07/09	Show Preempted: Wings
	Time: 7 pm	Show Aired: Frank Lloyd Wright Special
	Reason: One-hour special depicting the life & legacy of Frank Lloyd Wright as well as an inside look at the Monona Terrace Convention Center.	

Station Call Sign: WMTW

Affiliation:

ABC

A	Date: 02/10/30 Time: 8 pm	Show Preempted: My Wife & Kids/George Lopez/Bachelor II Show Aired: Gubernatorial debate & Jefferson Awards show
	Reason: Live televised debate with state's 4 candidates for governor	
B	Date: 02/06/20 Time: 8 pm	Show Preempted: Whose Line is it Anyway/Who Wants to be a Millionaire Show Aired: Minor League Baseball – Portland Sea Dogs
	Reason: Station airs @ 6 live games per season with city's minor league baseball team – Portland Sea Dogs.	
C	Date: 02/04/10 Time: 3 pm	Show Preempted: General Hospital Show Aired: NE Patriots Superbowl Champ. Parade
	Reason: Local/regional NFL team won Superbowl and visited downtown Portland w/team members, owner & trophy in tickertape parade.	
D	Date: 02/03/16 Time: 3 pm	Show Preempted: NHL Hockey Game Show Aired: Minor league hockey-local team-Portland Pirates
	Reason: Station airs @ 4 live hockey games per season of Portland's minor league team-Portland Patriots (AHL).	
E	Date: 02/01/18 Time: 8 pm	Show Preempted: America's Funniest Home Videos Show Aired: SportsRap Live
	Reason: Local sports talk/call-in show-this program featured discussions of local team-NE Patriots-making it to NFL playoffs.	

Station Call Sign: WNCT

Affiliation:

CBS

A	Date: Time:	Show Preempted: Show Aired:
	Reason:	
B	Date: Time:	Show Preempted: Show Aired:
	Reason:	
C	Date: Time:	Show Preempted: Show Aired:
	Reason:	
D	Date: Time:	Show Preempted: Show Aired:
	Reason:	
E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: WOAY

Affiliation: ABC

A	Date: 01/03/10 Time:	Show Preempted: ABC Sat. Movie Show Aired: State B.B. Chmp.
	Reason:	
B	Date: 01/03/17 Time:	Show Preempted: ABC Sat. Movie Show Aired: State B.B. Chmp.
	Reason:	
C	Date: 00/03/11 Time:	Show Preempted: ABC Sat. Movie Show Aired: State B.B. Chmp.
	Reason:	
D	Date: 00/03/18 Time:	Show Preempted: ABC Sat. Movie Show Aired: State B.B. Chmp.
	Reason:	
E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: WOI

Affiliation:

ABC

A	Date: 02/06/08 Time: 7 pm	Show Preempted: Making the Band Show Aired: Billy Graham
	Reason:	
B	Date: 01/08/17 Time: 7 pm	Show Preempted: Funniest Videos Show Aired: St. Jude's
	Reason:	
C	Date: 02/03/02 Time: 7 pm	Show Preempted: ABC Programming Show Aired: Variety Club Telethon
	Reason: Raised money for local Children's Charities	
D	Date: 02/03/08 Time: 7 pm	Show Preempted: Funniest Videos Show Aired: Girls High School Basketball
	Reason: State tournament	
E	Date: 02/03/09 Time: 7 pm	Show Preempted: ABC Movie Show Aired: Girls High School. Basketball
	Reason: State tournament	

Station Call Sign: WOKR

Affiliation:

ABC

A	Date: 01/09/05 Time: 8 pm	Show Preempted: My Wife & Kids Show Aired: Workplace Diversity
	Reason: This half hour special addressed the role of diversity in the workplace and the benefits both to the employer, employee, and community at large.	
B	Date: 01/12/20 Time: 8:30 pm	Show Preempted: Whose Line Is It Anyway Show Aired: Connect with Kids Special: Invisible Weapons
	Reason: This program takes a look at boys and girls who torment other children, featuring interviews with bullies, their victims, and bystanders.	
C	Date: 98/12/29 Time: 8 pm	Show Preempted: Home Improvement Show Aired: Many Voices, Many Visions: Taking Pride in Rochester
	Reason:	
D	Date: 97/04/20 Time:	Show Preempted: Passion to Play Show Aired: Easter Seals
	Reason: Telethon raising money for a cure.	
E	Date: 94/04/23 Time: Prime	Show Preempted: America's Funniest Videos Show Aired: Day of Caring
	Reason:	

Station Call Sign: WOWK Affiliation: CBS

A	Date: 97/01/24	Show Preempted: Raymond
	Time: 8:30 pm	Show Aired: King's Daughters--Heart Disease
	Reason: Informational medical series	
B	Date: 98/04/09	Show Preempted: Promised Land
	Time: 8 pm	Show Aired: Billy Graham
	Reason:	
C	Date: 99/01/27	Show Preempted: JAG/60 Minutes II
	Time: 8 pm	Show Aired: WVU/Marshall Basketball
	Reason: Local sports	
D	Date: 00/06/03	Show Preempted: Martial Law
	Time: 9 pm	Show Aired: Children's Miracle Network Telethon
	Reason: Community service	
E	Date: 01/09/21	Show Preempted: Diagnosis Murder
	Time: 8 pm	Show Aired: 3-Station Telethon for American Tragedy
	Reason: Telethon for 9/11/01 w/all stations contributing	

Station Call Sign: WOWT Affiliation: NBC

A	Date: 02/08/23	Show Preempted: NBC Prime
	Time: 7 pm	Show Aired: Big Red Preview
	Reason: Pre-season football special featuring local university	
B	Date: 02/06/09	Show Preempted: NBC Prime
	Time: 6 pm	Show Aired: Leprosy telethon
	Reason: Local charity fundraising	
C	Date: 02/03/12	Show Preempted: NBC Prime
	Time: 7 pm	Show Aired: Billy Graham Crusade
	Reason: Religious special	
D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	
E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: WPBN

Affiliation:

NBC

A	Date: 95/02/24	Show Preempted: Dateline
	Time: 8 pm	Show Aired: Munson Hospital "Heart" special
	Reason: Local program on largest hospital serving our DMA	
B	Date: 97/06/13	Show Preempted: Dateline
	Time: 8 pm	Show Aired: Success by Six
	Reason: Education special	
C	Date: 01/07/09	Show Preempted: Dateline
	Time: 10 pm	Show Aired: Cherries Jubilee
	Reason: Local station production commemorating the 75th anniversary of the National Cherry Festival, Northern Michigan's largest festival and industry	
D	Date: 01/08/21	Show Preempted: Spy TV
	Time: 8 pm	Show Aired: Football Frenzy
	Reason: Local production--a look at the upcoming high school football season	
E	Date: 02/10/28	Show Preempted: Fear Factor
	Time: 8 pm	Show Aired: League of Women Voters, Gubernatorial debate
	Reason: Live telecast of the only televised debate where all candidates on the ballot were invited to attend	

Station Call Sign: WPEC

Affiliation:

CBS

A	Date: 02/09/01	Show Preempted: CBS Sunday Movie
	Time: 9 pm	Show Aired: MDA Telethon
	Reason: Support of local families afflicted by neuromuscular disease	
B	Date: 00/06/03	Show Preempted: Martial Law, Walker Texas Ranger
	Time: 9 pm	Show Aired: Children's Miracle Network Telethon
	Reason: Raise funds to support local children's hospital.	
C	Date: 99/12/17	Show Preempted: Kids Say Darndest Things, Candid Camera
	Time: 8 pm	Show Aired: St. Jude's Children's Special
	Reason: Support children's research projects of St. Jude's hospital.	
D	Date: 02/10/27	Show Preempted: CBS Sunday Movie
	Time: 9 pm	Show Aired: Local Movie
	Reason: Last minute crush of political advertising displaced regular advertisers gearing up for holiday shopping season. Need extra inventory to clear local spots.	
E	Date: 92/08/23	Show Preempted: Various
	Time: 2:30 pm	Show Aired: Hurricane Andrew coverage
	Reason:	

Station Call Sign: WPLG

Affiliation:

ABC

A	Date: 00/12/29 Time: 8 pm	Show Preempted: Two Guys & A Girl, Norm Show Aired: Rewind 2000: The Putney Perspective
	Reason: Community Service	
B	Date: 00/04/26 Time: 8 pm	Show Preempted: Two Guys & A Girl, Then Came You Show Aired: WPLG Town Meeting: Building Bridges
	Reason: Community Service	
C	Date: 01/01/06 Time: 7 pm	Show Preempted: ABC Sat. Movie: The Rock Show Aired: United Negro College Fund Telethon
	Reason: Community Service	
D	Date: 01/08/25 Time: 8 pm	Show Preempted: ABC Sat. Movie Show Aired: FNN Stormwatch
	Reason: Community Service	
E	Date: 02/09/27 Time: 8 pm	Show Preempted: America's Funniest Videos Show Aired: Gubernatorial debate
	Reason: Community Service	

Station Call Sign: WPTV

Affiliation:

NBC

A	Date: 02/12/03 Time: 8 pm	Show Preempted: Just Shoot Me/The In-Laws Show Aired: Senior Living
	Reason: We were able to produce and sell a one hour compilation show featuring various choices in elderly care and assisted living	
B	Date: 01/12/05 Time: 8 pm	Show Preempted: Ed Show Aired: Billy Graham Special
	Reason: Billy Graham purchased the time in the wake of 9/11/01 when the country was anxious and looking for spiritual leadership	
C	Date: 02/01/29 Time: 8 pm	Show Preempted: Frasier/Three Sisters Show Aired: St. Jude Hospital
	Reason: Rather than running dismal repeats of sitcoms, we ran a one hour profile of the success stories of the Children's Hospital	
D	Date: 02/08/07 Time: 8 pm	Show Preempted: Spy TV/Downer Channel Show Aired: Paid programming: Heartland/Thunderstick
	Reason: Because neither network program was attractive to advertisers we opted to run paid programming	
E	Date: 02/09/10 Time: 11:30 am	Show Preempted: Various Show Aired: Gubernatorial primary coverage
	Reason: Because of statewide problems once again with the new electronic voting machines a winner was not determined until later the next day	

Station Call Sign: WPXI

Affiliation:

NBC

A	Date: 02/08/26 Time: 10 pm	Show Preempted: Show Aired: Pennsylvania Miners Rescue
	Reason: The PA miners rescue was a story that grabbed our nation. Our coverage was extensive due to the close proximity of the accident to Pittsburgh	
B	Date: 02/05/31 Time: 8 pm	Show Preempted: Show Aired: Breaking news--Tornado Hits
	Reason: Tornado ripped through our area causing damage & injuries at a local amusement park.	
C	Date: 00/10/23 Time: 10 pm	Show Preempted: Dateline NBC Show Aired: Political debate
	Reason: Senatorial seat up for grabs in a hotly contested race. Klink vs. Santorum	
D	Date: 99/12/06 Time: 8 pm	Show Preempted: Dateline NBC Show Aired: Y2K
	Reason: We attempted to separate the myths from facts about the Y2K effect on us locally.	
E	Date: 02/06/27 Time: 8:30 pm	Show Preempted: Sitcom Show Aired: Severe weather month
	Reason: Traditionally June & July are severe weather months in our region. Our program attempted to help our audience prepare for severe weather.	

Station Call Sign: WRAL

Affiliation:

CBS

A	Date: 02/11/20 Time: 9 pm	Show Preempted: Victoria's Secret Special Show Aired: One Amazing Night: Burt Bacharach
	Reason: As a community based company, we felt that the Victoria's Secret special was not quality programming.	
B	Date: 02/10/07 Time: 8 pm	Show Preempted: King of Queens Show Aired: President Bush Press (Iraq)
	Reason: We felt that what the President of the United States had to say on the Iraq situation was more important than a sitcom.	
C	Date: 01/04/02 Time: 8:30 pm	Show Preempted: Everybody Loves Raymond Show Aired: NCAA Special
	Reason: College basketball is very popular in this region.	
D	Date: 99/12/10 Time: 8 pm	Show Preempted: Kids Say the Darndest Things & Love & Money Show Aired: Nutcracker/Coats for the Kids
	Reason: Holiday season..."Coats" is a program we air annually--its purpose is to collect coats for those in need.	
E	Date: 97/12/24 Time: 9 pm	Show Preempted: Public Eye with Bryant Gumbel Show Aired: Spiritual Awakening
	Reason: Holiday season calls for holiday programming. This "Spiritual Awakening" special featured holiday gospel music.	

Station Call Sign:

WRCB

Affiliation:

NBC

A	Date: 02 Time: 8 pm	Show Preempted: Fear Factor Show Aired: President Bush's Speech on Iraq
	Reason: We felt our local viewers deserved to see the President & hear his explanation for why a war with Iraq may be necessary	
B	Date: 03, 04, 05 Time: TBD	Show Preempted: NBC Prime Show Aired: Veterans History Project
	Reason: We have partnered with the Library of Congress to be a local sponsor of the congressionally-mandated Veterans History Project. We will produce 3 one-hour documentaries which will tell the heroic stories of local veterans. These programs will air in primetime near memorial day.	
C	Date: 93/03 Time: Various	Show Preempted: Various Show Aired: Channel 3 Storm Alert Coverage
	Reason: Our area was hit by a major ice/snow storm. We pre-empted many hours of network programming to provide emergency information, answer viewer questions, seek emergency help for callers, update weather information, etc. We provided simulcast opportunities for local radio stations.	
D	Date: 00/11 Time: 9 am	Show Preempted: Today Show Show Aired: Live Coverage – Candidate Bush Campaign stop
	Reason: On the last day of the 2000 presidential campaign, Candidate George W. Bush made a campaign stop in Chattanooga. We covered his arrival and speech live. We would have done the same for VP Gore if he had visited. We thought a local visit by one of the major political candidates on the last day of the campaign warranted live coverage.	
E	Date: 96 Time: 5 am	Show Preempted: NBC Saturday Morning Line-up Show Aired: Channel 3 Storm Alert/New Coverage of Tornado
	Reason: A tornado struck a local community causing extensive damage. The tornado struck during early morning darkness while many people slept. Our coverage featured live reports from the scene, weather updates, safety tips, contact info, etc.	

Station Call Sign: WRDW

Affiliation:

CBS

A	Date: 01/12/05 Time: 10 pm	Show Preempted: The Agency Show Aired: Billy Graham
	Reason: Revenue	
B	Date: 01/12/07 Time: 8 pm	Show Preempted: Ellen/TBA Show Aired: Billy Graham
	Reason: Revenue	
C	Date: 01/09/06 Time: 8 pm	Show Preempted: 48 Hours Show Aired: Billy Graham
	Reason:	
D	Date: 02/09/07 Time: 8 pm	Show Preempted: Diagnosis Murder Show Aired: Billy Graham
	Reason: Revenue	
E	Date: 02/09/06 Time: 9 pm	Show Preempted: 48 Hours Show Aired: Billy Graham
	Reason: Revenue	

Station Call Sign: WREG

Affiliation:

CBS

A	Date: 01/03/05 Time: 8 pm	Show Preempted: Some of My Best Friends Show Aired: St. Jude Special
	Reason:	

B	Date: 01/05/24 Time: 7 pm	Show Preempted: Funny Flubs & Screwups Show Aired: Kids Count Special: Classrooms at the Crossroad
	Reason:	

C	Date: 01/06/01 Time: 8 pm	Show Preempted: Diagnosis Murder Show Aired: Ducks Unlimited Great Outdoor Festival
	Reason:	

D	Date: 00/05/29 Time: 7 pm	Show Preempted: King of Queens, Everybody Loves Raymond, Becker Show Aired: MIM Sunset Symphony
	Reason:	

E	Date: 99/05/08 Time: 7 pm	Show Preempted: Annual Academy of Country Music Awards Show Aired: News Ch. 3 Weather Tornado coverage
	Reason:	

Station Call Sign: WREX

Affiliation:

NBC

A	Date: 01/02/10 Time: 3:30 pm	Show Preempted: NBC Sports Show Aired: Illinois Basketball
	Reason: Illinois college basketball is aired very little (ESPN)	

B	Date: 00/06/24 Time: 7 pm	Show Preempted: NBC Prime Show Aired: Arthritis telethon
	Reason: WREX has an annual contract to air the Arthritis telethon	

C	Date: 99/08/18 Time: 8 pm	Show Preempted: NBC Prime Show Aired:
	Reason: WREX aired a 1 hour special on school violence due to the major school violence events.	

D	Date: 98/08/12 Time: 7 pm	Show Preempted: NBC Prime Show Aired: St. Jude
	Reason: St. Jude special aired to raise funds for St. Jude	

E	Date: 97/12/05 Time: 7 pm	Show Preempted: NBC Prime Show Aired: Billy Graham
	Reason: NBC airs Billy Graham for family friendly religious programming	

Station Call Sign: WSAZ

Affiliation:

NBC

A	Date: 02/08/31	Show Preempted: Meet My Folks, Dog Eat Dog
	Time: 8 pm	Show Aired: Marshall University Football Game
	Reason: Commitment/contract to carry MU sports--aired net shows on delay	
B	Date: 02/06/08	Show Preempted: NBC Nightly News
	Time: 6:30 pm	Show Aired: Local news
	Reason: Network preempted 6-6:30 pm preempting local news	
C	Date: 02/09/02	Show Preempted: Today, Soaps
	Time: 4:30 am	Show Aired: Jerry Lewis Telethon
	Reason: WSAZ televise telethon annually	
D	Date: 02/12/17	Show Preempted: SNL Christmas Past
	Time: 7 pm	Show Aired: Marshall University Basketball Game
	Reason: Commitment/contract to carry MU sports--aired net shows on delay	
E	Date: 02/12/30	Show Preempted: Fear Factor, Third Watch
	Time: 8 pm	Show Aired: University of Kentucky Basketball Game
	Reason: Commitment to carry local college sports--net shows televised on delay	

Station Call Sign: WSB

Affiliation:

ABC

A	Date: 02/11/11	Show Preempted: ABC World News Now, Good Morning America
	Time: 2:30 am	Show Aired: Severe Weather coverage
	Reason: Channel 2 Action News Severe Weather team warned viewers of the deadly storms and covered the aftermath.	
B	Date: 02/09/10	Show Preempted: My Wife and Kids, According to Jim
	Time: 8 pm	Show Aired: 9-11 One Year Later: A Town Hall Meeting
	Reason: One year later, how has the country changed? How has Atlanta changed? This program facilitated dialogue.	
C	Date: 02/02/28	Show Preempted: Whose Line (two times)
	Time: 8 pm	Show Aired: Living Legends of the Civil Rights Movement
	Reason: Retelling of events by the leaders involved of the Civil Rights movement in the South	
D	Date: 02/06/24	Show Preempted: ABC Movie
	Time: 8 pm	Show Aired: A Declaration of Independence
	Reason: Provided community a background on the significance of the original document on display in Atlanta.	
E	Date: 02/09/03	Show Preempted: According to Jim
	Time: 8 pm	Show Aired: Stressed Out: Solutions with Dr. Randy Martin
	Reason: Provided viewers with some solutions for dealing with daily stress.	

Station Call Sign: WSEE Affiliation: CBS

A	Date: 01/03/30 Time: 8 pm	Show Preempted: Diagnosis Murder Show Aired: St. Jude Special
	Reason:	
B	Date: 00/12/02 Time: 6 pm	Show Preempted: CBS News/Frosty Show Aired: High School Football
	Reason: Local team going to state championship game they won.	
C	Date: 97/02/14 Time: 8 pm	Show Preempted: Dave's World, Raymond, JAG Show Aired: High School Basketball
	Reason: Part of a local football & basketball package; high school and college	
D	Date: 95/12/30 Time: 6 pm	Show Preempted: Dr. Quinn, Touched Show Aired: College Basketball Championship Game Local Tournament
	Reason:	
E	Date: 95/05/06 Time: 8 pm	Show Preempted: Dr. Quinn, Walker Show Aired: Erie Philharmonic
	Reason: Final concert of conductor	

Station Call Sign: WSFA Affiliation: NBC

A	Date: 02/11/22 Time: 8 pm	Show Preempted: Dateline NBC Show Aired: Iron Bowl Preview
	Reason: Extremely high interest in annual Auburn/Alabama football game	
B	Date: 02/11/16 Time: 11:30 am	Show Preempted: NASCAR Ford 300 Show Aired: SEC football game
	Reason: WSFA carries all SEC games from J.P. Sports. There is high interest in SEC football in this area.	
C	Date: 02/11/05 Time: 7 pm	Show Preempted: All prime programming Show Aired: State election coverage
	Reason: Viewers expect WSFA to cover elections	
D	Date: 02/06/01 Time: 7 pm	Show Preempted: Prime programming Show Aired: Children's Miracle Network
	Reason: This broadcast raises money for Children's Hospital in Birmingham. Thousands of children in WSFA's viewing area have benefited from Children's Hospital.	
E	Date: 02/03/07 Time: 7 pm	Show Preempted: Primetime Show Aired: SEC Basketball Tournament
	Reason: High interest in tournament games involving Auburn or Alabama	

Station Call Sign: WSIL

Affiliation:

ABC

A	Date: 93/94 Time: 9 pm	Show Preempted: NYPD Blue Show Aired: Various
	Reason: Rejected this network program. After first few weeks ABC placed it on Fox affiliate.	

B	Date: 94/03 Time: 7 pm	Show Preempted: Various Show Aired: IHSA Basketball
	Reason: For many years preempted 4 nights annually with high school basketball playoffs	

C	Date: 02/04 Time: 1 pm	Show Preempted: ABC Sports Show Aired: Arthritis telethon
	Reason: Annually carry a locally produced telethon for the Arthritis Foundation	

D	Date: Time:	Show Preempted: Show Aired:
	Reason:	

E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: WSMV

Affiliation:

NBC

A	Date: 02/09/21 Time: 12 noon	Show Preempted: Sports Show Aired: Paramount Movie: Top Secret
	Reason: Contract commitment	

B	Date: 02/09/22 Time: 12 noon	Show Preempted: Sports Show Aired: Paramount Movie: The Presidio
	Reason: Contract obligation	

C	Date: 02/09/22 Time: 3 pm	Show Preempted: Sports Show Aired: Paramount Movie: Perfect Weapon
	Reason: Contract obligation	

D	Date: 02/09/29 Time: 3:30 pm	Show Preempted: NBC Sports Show Aired: NBC Children's Programs: Just Deal, All About Us, Skate
	Reason: FCC regulations	

E	Date: 02/04/13 Time: 12 noon	Show Preempted: NBC Sports Show Aired: Paramount Movie: Grease II
	Reason: Contract obligation	

Station Call Sign: WSOC

Affiliation:

ABC

A	Date: 01/10/24 Time: 8:30 pm	Show Preempted: According to Jim Show Aired: Severe Weather Special
	Reason: Season weather special produced by the news department to prepare viewers for winter months--a series of weather specials throughout the year.	
B	Date: 02/06/20 Time: 8 pm	Show Preempted: Whose Line Is It Anyway Show Aired: Health Digest
	Reason: Medical in-depth look at health issues--i.e., stroke, heart attack, diabetes, etc. Partnership w/local hospital.	
C	Date: 01/08/10 Time: 8 pm	Show Preempted: America's Funniest Videos, Millionaire, 20/20 Show Aired: Carolina Panthers pre-season football game
	Reason: NFL Professional Team-since Aug. 2000, WSOC-TV has aired two Pre-Season games each year in prime time.	
D	Date: 00/11/07 Time: 10 pm	Show Preempted: ABC Election Coverage Show Aired: Eyewitness News Vote 2000
	Reason: Local election coverage	
E	Date: 00/12/20 Time: 9 pm	Show Preempted: Drew Carey/Spin City Show Aired: Family Focus Special
	Reason: Produced by news department-Family Focus is a total on-air, events driven campaign that's been on WSOC-TV for 12 yrs-the specials air periodically to address topics such as peer pressure, spousal abuse, homelessness, etc.	

Station Call Sign: WSTM

Affiliation:

NBC

A	Date: 01/08/14 Time: 8 pm	Show Preempted: Spy TV, Spy TV Show Aired: Educator of the Week Awards
	Reason:	
B	Date: 00/02/15 Time: 8 pm	Show Preempted: 3rd Rock, 3rd Rock Show Aired: WSTM 50th Anniversary special
	Reason:	
C	Date: 99/09/08 Time: 8 pm	Show Preempted: Dateline Show Aired: Heart Healthy for Life
	Reason:	
D	Date: 99/09/15 Time: 8 pm	Show Preempted: Dateline Show Aired: How to Keep Our Kids Safe at School
	Reason:	
E	Date: 99/06/21 Time: 8 pm	Show Preempted: Suddenly Susan, Suddenly Susan Show Aired: Health Special: Taking Care of Mom
	Reason:	

Station Call Sign: WTAJ

Affiliation:

CBS

A	Date: 01/06/02 Time: 9 pm	Show Preempted: CBS Prime Show Aired: CMN Telethon
	Reason: Children's Miracle Network telethon	
B	Date: 01/06/30 Time: 8 pm	Show Preempted: District, Walker Texas Ranger, District Show Aired: Altoona Curve
	Reason: Local baseball game	
C	Date: 01/08/20 Time: 9:30 pm	Show Preempted: Yes Dear Show Aired: Home Improvement
	Reason: Makegood necessities for primetime	
D	Date: 01/09/07 Time: 8 pm	Show Preempted: Diagnosis Murder Show Aired: St. Jude's
	Reason: St. Jude's Children's Research Hospital	
E	Date: 01/12/07 Time: 8 pm	Show Preempted: Funny Flubs & Screw Ups Show Aired: St. Jude's
	Reason: As above	

Station Call Sign: WTHR

Affiliation:

NBC

A	Date: Time: 10 pm	Show Preempted: Misc. Net Show Aired: Pacer Postgame
	Reason: Following NBA Pacer game we aired a postgame special while team was in NBA playoffs	
B	Date: Time:	Show Preempted: NBC Misc. Show Aired: Project XL
	Reason: Local show honoring talented area high school students	
C	Date: March Time: 8 pm	Show Preempted: NBC Misc. Show Aired: Surviving the Storm
	Reason: 30 minute severe weather special w/survival tips	
D	Date: Time:	Show Preempted: Show Aired:
	Reason:	
E	Date: Time:	Show Preempted: Show Aired:
	Reason:	

Station Call Sign: WTLV

Affiliation:

NBC

A	Date: 01/09/15 Time: 10 am	Show Preempted: City Guys/All About Us Show Aired: Good Morning Jacksonville Sept. 11 Special
	Reason: Local news program on evolving breaking news 9/11 story	
B	Date: 01/06/09 Time: 8 pm	Show Preempted: NBC Sat. Movie Show Aired: Florida Sports Awards
	Reason: Station is official broadcaster for this annual statewide/local awards program and Otis Smith Foundation fundraiser.	
C	Date: 01/03/23 Time: 10 pm	Show Preempted: Law & Order Show Aired: Dateline Jacksonville
	Reason: Local news program aired after rating book to follow-up on key local stories, keeping viewers informed.	
D	Date: 00/05/25 Time: 8 pm	Show Preempted: Friends & Jessie Show Aired: Straight Talk
	Reason: This Jacksonville Jaguars Foundation program addressing teen pregnancy aired on all stations in the market.	
E	Date: 00/10/23 Time: 8 pm	Show Preempted: Daddio & Tucker Show Aired: Senatorial debate
	Reason: This political program was run to keep our viewers informed on the important race.	

Station Call Sign: WTMJ

Affiliation:

NBC

A	Date: 02/01/14 Time: 7 pm	Show Preempted: Fear Factor Show Aired: Dreambuilder
	Reason: Special program focused on better community understanding through diversity & tolerance. Program was filmed on location in Milwaukee for this season.	
B	Date: 02/03/17 Time: 8 pm	Show Preempted: Law & Order: Criminal Intent, Dateline Show Aired: TMJ4 Movie Special: The Yearling
	Reason: Local movie to take advantage of timely sales opportunities.	
C	Date: 02/03/26 Time: 8 pm	Show Preempted: Frasier Show Aired: Aurora Health Care
	Reason: Local health special focused on community health concerns and a sales development opportunity.	
D	Date: 02/04/08 Time: 7 pm	Show Preempted: Fear Factor Show Aired: Milwaukee County Executive Debate
	Reason: Political candidate debate	
E	Date: 02/04/16 Time: 7 pm	Show Preempted: Will & Grace Show Aired: TMJ4 Weather Special
	Reason: Tornado awareness special to create audience awareness of severe weather and build brand image.	

Station Call Sign: WTOL

Affiliation:

CBS

A	Date: 00/10/26 Time: 9 pm	Show Preempted: City of Angels Show Aired: WTOL Town Hall Meeting
	Reason: News special on issues facing Northwest Ohio.	
B	Date: 01/04/11 Time: 8 pm	Show Preempted: JAG Show Aired: WTOL Town Hall Meeting
	Reason: Special news program on local educational issues.	
C	Date: 01/08/29 Time: 8 pm	Show Preempted: 60 Minutes II Show Aired: WTOL Town Hall Meeting
	Reason: Political candidates news special.	
D	Date: 01/10/30 Time: 8 pm	Show Preempted: JAG Show Aired: WTOL Mayoral Debate
	Reason: News special--debate between Toledo mayoral candidates.	
E	Date: 02/10/16 Time: 8 pm	Show Preempted: 60 Minutes II Show Aired: WTOL Ask the Candidates
	Reason: Candidates for local county commissioner expressed their views prior to the November 5th election.	

Station Call Sign: WTSP

Affiliation:

CBS

A	Date: 01/04/13 Time: 8 pm	Show Preempted: Diagnosis Murder Show Aired: 10 News Drought Watch
	Reason: At height of 3 year drought, this news special examined the devastating local effects of record low water levels	
B	Date: 00/12/27 Time: 8:30 pm	Show Preempted: CBS Network Show Aired: 10 Who Care Volunteer Service Awards
	Reason: This news special highlighted 10 local community volunteers	
C	Date: 99/05/28 Time: 8 pm	Show Preempted: Kids Say Darndest Things/Candid Camera Show Aired: Stormwatch '99
	Reason: News special covered hurricane-related public safety topics including evacuation routes & hurricane survival tips	
D	Date: 98/04/05 Time: 1 pm	Show Preempted: Various CBS Sports Show Aired: Tampa Bay Devil Rays Baseball
	Reason: This local sports game was part of the team's inaugural season. WTSP aired this game as part of 12 game pkg of afternoon games.	
E	Date: 97/09/10 Time: 8 pm	Show Preempted: The Nanny Show Aired: Grading Our Schools
	Reason: 10 News special examined the state of Tampa Bay schools, successes, failures & innovations.	

Station Call Sign: WTVF

Affiliation: ABC

A	Date: March Time: 8 pm	Show Preempted: ABC Sat. Movie Show Aired: R. McDonald Telethon
	Reason: Telethon airs each year to raise money for Ronald McDonald House in Chattanooga	
B	Date: June Time: 1 pm	Show Preempted: ABC Various Show Aired: Children's Miracle Network Telethon
	Reason: Telethon airs each year to raise money for T.C. Thompson Children's Hospital in Chattanooga	
C	Date: Various Time: 8 pm	Show Preempted: ABC Prime Show Aired: Billy Graham
	Reason: Crusades led by Billy Graham air each year (4 months)	
D	Date: Sept. Time: 11:30 am	Show Preempted: ABC & Local Programs Show Aired: MDA Telethon
	Reason: MDA Telethon airs yearly as a nationwide telethon.	
E	Date: Fall Time: 1 pm	Show Preempted: ABC Various Sports Show Aired: Phil Fulmer Show
	Reason: University of TN football coaches show will air and we join in progress ABC when necessary.	

Station Call Sign: WTVF

Affiliation: CBS

A	Date: 02/10/13 Time: 6 pm	Show Preempted: 60 Minutes Show Aired: U.S. Senate Debate
	Reason: Debate for open Senate seat between two high-profile candidates	
B	Date: 02/08/14 Time: 7 pm	Show Preempted: 60 Minutes II Show Aired: Gubernatorial Debate
	Reason: Debate for open Governor's seat between two high-profile candidates	
C	Date: 02/08/01 Time: 9 pm	Show Preempted: The Agency Show Aired: Primary Election coverage
	Reason: Tennessee primary elections for key statewide races.	
D	Date: 00/06/03 Time: 9 pm	Show Preempted: Walker, Texas Ranger Show Aired: Children's Miracle Network
	Reason: Telethon--proceeds go locally to support Vanderbilt's Children's Hospital	
E	Date: 99/01/27 Time: 7 pm	Show Preempted: Diagnosis Murder Show Aired: Titan Super Bowl Preview
	Reason: Tennessee Titans were playing 3 days later in the Super Bowl. The special reviewed the past season and previewed the big game.	

Station Call Sign: WTVQ

Affiliation:

ABC

A	Date: 02/12/04 Time: 11:05 pm	Show Preempted: Nightline/Close Up Show Aired: State of the Local Schools
	Reason: Schools at critical crossroads. Falling test scores, financial crisis--inform community in long form for detail.	
B	Date: 02/10/30 Time: 7 pm	Show Preempted: My Wife & Kids Show Aired: Public Safety Referendum
	Reason: Ballot issue to address public safety crisis. Measure passed by 500 votes. First time ever. Station played pivotal role in providing detailed, complex info.	
C	Date: 02/10/07 Time: 7 pm	Show Preempted: Tues. ABC Prime Show Aired: Gubernatorial Debate
	Reason: Station hosted live, 1 hr. debate--provided statewide feed.	
D	Date: 02/03/14 Time: 7 pm	Show Preempted: ABC Prime Show Aired: Dist. 205 Referendum
	Reason: School at financial crisis. Threatened w/takeover by state--station news special looked at problem and solutions.	
E	Date: 02/03/08 Time: 6:30 pm	Show Preempted: Local synd. & ABC Prime Show Aired: Debate of Legislative Candidates
	Reason: Key races--3 debates for all candidates in local legislative races.	

Station Call Sign: WTVQ

Affiliation:

ABC

A	Date: 01/03/30 Time: 8 pm	Show Preempted: Two Guys & A Girl, Norm Show Aired: Stormwatch 2001
	Reason: Weather special for station and market.	
B	Date: 01/04/09 Time: 7 pm	Show Preempted: Ent. Tonight, Seinfeld, ABC Movie: Final Jeopardy, Gideon's Crossing Show Aired: Legends Baseball
	Reason: Locally produced sporting event--station has partnership with this baseball team	
C	Date: 01/04/13 Time: 8 pm	Show Preempted: Making the Band Show Aired: Coral Ridge Easter Special
	Reason:	
D	Date: 01/08/25 Time: 7 pm	Show Preempted: ABC Movie: Long Kiss Goodnight Show Aired: 2nd Annual Gridiron Classic
	Reason: Locally produced high school football game--part of our community partnership	
E	Date: 01/09/23 Time: 7 pm	Show Preempted: ABC Movie: The Mask Show Aired: Paramount WTVQ Movie: Days of Thunder
	Reason: Monetary reasons following 9/11 news coverage	

Station Call Sign: WUSA

Affiliation:

CBS

A	Date: 02/09/10	Show Preempted: CSI
	Time: 10 pm	Show Aired: 9/11 A Year of Recovery
	Reason: 1 year anniversary special to highlight Pentagon victims families/survivors	
B	Date: 02/10/24	Show Preempted: CBS News
	Time: 4:30 am	Show Aired: Local news
	Reason: Sniper attack story--breaking news	
C	Date: 02/06/01	Show Preempted: The District
	Time: 10 pm	Show Aired: Children's Telethon
	Reason: Event to raise money for local hospital	
D	Date: 02/11/05	Show Preempted: CBS News
	Time: 4:30 am	Show Aired: 9 News
	Reason: Election special/results wrapup	
E	Date: 02/04/01	Show Preempted: Raymond/Baby Bob
	Time: 8 pm	Show Aired: Sports Special/Local
	Reason: Sports pregame special to highlight local teams in NCAA tournament	

Station Call Sign: WVSX

Affiliation:

CBS

A	Date: 02/09/07	Show Preempted: Sports spectacular
	Time: 12 noon	Show Aired: WVU vs. Wisconsin
	Reason: State university college football of greater local interest	
B	Date: 02/09/28	Show Preempted: Sports spectacular
	Time: 12 noon	Show Aired: East Carolina vs. WVU
	Reason: State university college football of greater local interest	
C	Date: 02/10/19	Show Preempted: Sports spectacular
	Time: 12 noon	Show Aired: Syracuse vs. WVU
	Reason: State university college football of greater local interest	
D	Date: 02/03/02	Show Preempted: PGA Golf
	Time: 2 pm	Show Aired: WVU at Pittsburgh
	Reason: State university basketball of greater local interest	
E	Date: 02/02/09	Show Preempted: PGA Golf
	Time: 4 pm	Show Aired: Seton Hall at WVU
	Reason: State university basketball of greater local interest	

Station Call Sign: WVNY

Affiliation:

ABC

A	Date: 2001	Show Preempted:
	Time:	Show Aired: Local playoff game
	Reason: Local sports	

B	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

C	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: WWL

Affiliation:

CBS

A	Date: 02/12/02	Show Preempted: King of Queens/Yes Dear
	Time: 7 pm	Show Aired: Eye on Louisiana: Senate Debate
	Reason: Senatorial debate--very important election--our responsibility to our community.	

B	Date: 02/06/03	Show Preempted: King of Queens
	Time: 7 pm	Show Aired: Eye on Hurricanes 2002
	Reason: Hurricane preparation is a most important issue in SE Louisiana.	

C	Date: 02/10/29	Show Preempted: The Guardian
	Time: 7 pm	Show Aired: Eye on Louisiana: Senate Debate
	Reason: Senatorial debate--very important election--our responsibility to our community.	

D	Date: 02/08	Show Preempted: CBS Prime
	Time: 7 pm	Show Aired: New Orleans Saints Pre Season Football
	Reason: (4 games)	

E	Date: 02/02/02	Show Preempted: CBS Prime
	Time: 8 pm	Show Aired: Eye on City Hall
	Reason: Very important city elections--Mayoral race and runoff	

Station Call Sign: WWSB Affiliation: ABC

A	Date:	Show Preempted: Various
	Time:	Show Aired: MDA Telethon
	Reason:	

B	Date:	Show Preempted: Various
	Time:	Show Aired: Hurricane Georges
	Reason:	

C	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: WXYZ Affiliation: ABC

A	Date: 02/07/22	Show Preempted: John Stossel
	Time: 8 pm	Show Aired: Gubernatorial Debate
	Reason: Michigan's Gubernatorial Candidates square-off in state's only live telecast before Democratic Primary	

B	Date: 02/08/17	Show Preempted: ABC Movie: James Bond
	Time: 8 pm	Show Aired: Woodward Dream Cruise
	Reason: Live coverage of local auto parade celebrating classic cars. Over 1 million fans attend	

C	Date: 02/09/18	Show Preempted: My Wife & Kids
	Time: 8:30 pm	Show Aired: From the Heart
	Reason: Michigan children with cancer are profiled as they battle their illnesses and keep their spirits alive	

D	Date: 02/06/17	Show Preempted: Whose Line
	Time: 8 pm	Show Aired: Red Wings Stanley Cup
	Reason: Detroit salutes its Stanley Cup championship Red Wings--coverage of victory parade & highlights	

E	Date: 02/01/11	Show Preempted: Once & Again/Am. Funniest
	Time: 8 pm	Show Aired: Detroit Auto Show
	Reason: Live 2-hour program highlighting Detroit Auto Show opening. Charity event generates 6.1 million to local charities	

Station Call Sign: WYFF

Affiliation:

NBC

A	Date: 01/12/05	Show Preempted: Ed
	Time: 8 pm	Show Aired: Strom Thurmond at 99
	Reason: Local news special	
B	Date: 01/06/02	Show Preempted: NBC Movie of the Week
	Time: 9 pm	Show Aired: CMN Telethon
	Reason: Partnership with Children's Hospital in Greenville	
C	Date: 01/04/25	Show Preempted: Ed
	Time: 8 pm	Show Aired: Celine Dion Concert
	Reason: Sales spot carrier	
D	Date: 01/05/25	Show Preempted: Dateline
	Time: 8 pm	Show Aired: Remarkable Journey
	Reason: Remarkable Journey produced by Hearst-Argyle and natl. NAACP. Also served as sales spot carrier.	
E	Date: 00/04/18	Show Preempted: Frasier
	Time: 8 pm	Show Aired: Remarkable Journey
	Reason: Same as above.	

Station Call Sign: WYTV

Affiliation:

ABC

A	Date: 02/03/28	Show Preempted: Whose Line Is It?
	Time: 8:30 pm	Show Aired: Bob & the Boys
	Reason: Aired local sports roundtable to discuss local sporting events	
B	Date: 02/10/10	Show Preempted: Monk
	Time: 8 pm	Show Aired: Forum on Cancer
	Reason: Local health pgm giving viewers opportunity to call in and ask specialists health questions regarding cancer.	
C	Date: 02/10/24	Show Preempted: Monk
	Time: 8 pm	Show Aired: Local debate
	Reason: Local debate for 6th Congressional District	
D	Date: 02/09/30	Show Preempted: Drew/Whose Line
	Time: 8 pm	Show Aired: Home Loan Hour
	Reason: Live viewer call-in to local bankers to discuss interest, mortgage rates, equity loans, etc.	
E	Date: 02/05/30	Show Preempted: Whose Line/Whose Line
	Time: 8 pm	Show Aired: Forum on Children's Health
	Reason: Local health program discussing children's health matters--viewers call in to Pediatricians to ask their questions	

Station Call Sign: WZZM

Affiliation:

ABC

A	Date: 02/10/30 Time: 10 pm	Show Preempted: MDs Show Aired: Conversation with the Candidates
	Reason: Local news special; one on one interviews with the 2 candidates (major party) running for governor	
B	Date: 02/09/18 Time: 8 pm	Show Preempted: My Wife & Kids Show Aired: 13 Friends for Life: Race for the Cure
	Reason: Local news special: breast cancer awareness, detection & resources	
C	Date: 02/07/22 Time: 8 pm	Show Preempted: The Night Shamalyans Signs of Fear Show Aired: Democratic Debate for Governor
	Reason: Live debate with 3 Democratic candidates for governor prior to the primary	
D	Date: 02/07/09 Time: 8 pm	Show Preempted: According to Jim Show Aired: 13 Food for Families: Hunger in West Michigan
	Reason: Local news special: the need for food at area food pantries & those who are trying to meet the need.	
E	Date: 02/04/18 Time: 8 pm	Show Preempted: Whose Line/Whose Line Show Aired: Healing the Racial Divide
	Reason: Local news special: a look at the root causes of racism and local diversity issues	

Station Call Sign: KXAN

Affiliation:

NBC

A	Date: 00/09/30 Time: 8 pm	Show Preempted: NBC Movie of the Week Show Aired: MDA Telethon
	Reason:	
B	Date: 00/09/14 Time: 7:30 pm	Show Preempted: Just Shoot Me Show Aired: KXAN Extra
	Reason: News special	
C	Date: 00/12/05 Time: 7 pm	Show Preempted: Michael Richards Show, 3rd Rock from the Sun, Frasier, DAG, Dateline Show Aired: San Antonio Spurs Basketball Game
	Reason: Texas basketball team	
D	Date: 01/01/13 Time: 7 pm	Show Preempted: NBC Movie of the Week Show Aired: West TX Rehab Telethon
	Reason:	
E	Date: 01/07/03 Time: 7 pm	Show Preempted: Spy TV Show Aired: KXAN Extra
	Reason: News special highlighted education & GED	

Station Call Sign: WANE

Affiliation:

CBS

A	Date: 00/01/17 Time: 7 pm	Show Preempted: King of Queens/Ladies Man Show Aired: Dreambuilder Celebration "Brotherly Love"
	Reason:	
B	Date: 00/10/10 Time: 7 pm	Show Preempted: JAG Show Aired: Gubernatorial Debate (Indiana)
	Reason:	
C	Date: 00/03/09 Time: 8 pm	Show Preempted: Diagnosis Murder Show Aired: Dreambuilder Celebration "Our Father"
	Reason:	
D	Date: 02/03/06 Time: 9 pm	Show Preempted: King of Queens/Yes Dear Show Aired: Dreambuilder Celebration "The Movement"
	Reason:	
E	Date: 02/12/10 Time: 5:30 pm	Show Preempted: CBS Sports Spectacular Show Aired: Great American Toy Test
	Reason:	

Station Call Sign: WISH

Affiliation:

CBS

A	Date: 99/10/20 Time: 8 pm	Show Preempted: Cosby/Work with Me Show Aired: Mayoral debate
	Reason: Local political debate	
B	Date: 00/04/21 Time: 8 pm	Show Preempted: Cosby Show Aired: We Value Youth
	Reason: Local public affairs--children	
C	Date: 98/11/13 Time: 9 pm	Show Preempted: n/a Show Aired: Election coverage
	Reason: Local news--election coverage	
D	Date: 96/06/05 Time: 8 pm	Show Preempted: n/a special Show Aired: Billy Graham Crusade
	Reason: Religious programming	
E	Date: 01/05/26 Time: 8 pm	Show Preempted: Walker Texas Ranger Show Aired: 500 Festival Parade
	Reason: Local event coverage	

Station Call Sign: WOOD

Affiliation: NBC

A	Date: 2000	Show Preempted:
	Time: 8 pm	Show Aired: Debate
	Reason: Presidential Republican primary debate live from Grand Rapids, MI	
B	Date: 02/11/26	Show Preempted: Hidden Hills
	Time: 9:30 pm	Show Aired: New Governor transition
	Reason: First change of governor & party in more than a decade	
C	Date: 02/05/30	Show Preempted: Just Shoot Me
	Time: 9:30 pm	Show Aired: News special: A Millionaire's Murder
	Reason: Sensational murder "cold case" had just been solved, we followed case from beginning some 18 yrs ago.	
D	Date: 02/08/01	Show Preempted: ER
	Time: 10 pm	Show Aired: Severe Weather
	Reason: Tornadoes spotted throughout region, #1 WX dept. stayed on air reporting.	
E	Date: 02/06/01	Show Preempted: The 60s
	Time: 8 pm	Show Aired: CMN Champions Telethon
	Reason: Our annual telethon serving the local Children's Hospital.	

Station Call Sign: KKCO

Affiliation: NBC

A	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	
B	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	
C	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	
D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	
E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

Station Call Sign: KIDK

Affiliation:

CBS

A	Date: 02/11/20	Show Preempted: Victoria's Secret
	Time: 8 pm	Show Aired: St. Jude Research Hosp.
	Reason: Did not meet community standards for family viewing hour	
B	Date: 02/11/23	Show Preempted: CBS NCAA
	Time: 1 pm	Show Aired: Boise State football
	Reason: Local team	
C	Date: 02/11/02	Show Preempted: CBS Prime
	Time: 7 pm	Show Aired: Boise State Football
	Reason: Local team	
D	Date: 02/10/26	Show Preempted: CBS NCAA
	Time: 3 pm	Show Aired: Boise State Football
	Reason: Local team	
E	Date: 02/10/12	Show Preempted: CBS Prime/CBS News
	Time: 5 pm	Show Aired: Boise State Football
	Reason: Local team	

Station Call Sign: WOTV

Affiliation:

ABC

A	Date: 2000	Show Preempted:
	Time: 8 pm	Show Aired: Debate
	Reason: Presidential Republican primary debate live from Grand Rapids, MI	
B	Date: 02/11/26	Show Preempted: Hidden Hills
	Time: 9:30 pm	Show Aired: New Governor transition
	Reason: First change of governor & party in more than a decade	
C	Date: 02/05/30	Show Preempted: Just Shoot Me
	Time: 9:30 pm	Show Aired: News special: A Millionaire's Murder
	Reason: Sensational murder "cold case" had just been solved, we followed case from beginning some 18 yrs ago.	
D	Date: 02/08/01	Show Preempted: ER
	Time: 10 pm	Show Aired: Severe Weather
	Reason: Tornadoes spotted throughout region, #1 WX dept. stayed on air reporting.	
E	Date: 02/06/01	Show Preempted: The 60s
	Time: 8 pm	Show Aired: CMN Champions Telethon
	Reason: Our annual telethon serving the local Children's Hospital.	

Station Call Sign:

WMDN

Affiliation:

CBS

A	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

B	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

C	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

D	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

E	Date:	Show Preempted:
	Time:	Show Aired:
	Reason:	

ATTACHMENT 3

RECEIVED

Before the
Federal Communications Commission
Washington, D.C.

NOV 25 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the matter of)	
)	
2002 Biennial Regulatory Review – Review of the)	MB Docket No. 02-277
Commissions' Broadcast Ownership Rules and)	
Other Rules Adopted Pursuant to Section 202 of)	
the Telecommunications Act of 1996)	
)	
Cross-Ownership of Broadcast Stations and)	MM Docket No. 01-235
Newspapers)	
)	
Rules and Policies Concerning Multiple)	MM Docket No. 01-317
Ownership of Radio Broadcast Stations)	
in Local Markets)	
)	
Definition of Radio Markets)	MM Docket No. 00-244

REQUEST FOR COLLECTION OF DATA BY FCC

The Network Affiliated Stations Alliance ("NASA"), a coalition of the associations representing stations affiliated with (but not owned by) the ABC, CBS and NBC television networks, and the National Association of Broadcasters ("NAB") hereby request that the Commission request the submission of certain data from each of the ABC, CBS, and NBC television networks with respect to preemptions and clearances of network programming by both affiliates and network owned-and-operated stations ("O&Os"). In its Notice of Proposed Rulemaking ("Notice") in this proceeding, the Commission requested comment and information with respect to the preemption practices of network O&Os and affiliates. NASA and NAB do not have access to preemption and clearance data pertaining to the network O&Os. In addition, we have determined through interviews with a number of program managers and other officials at independently-owned affiliated stations that there is no standard manner in which affiliates maintain preemption records and that any such records may be incomplete and may reflect only a

0-10
List ABOVE

limited, recent period of time. By contrast, it is NASA's and NAB's understanding that the networks maintain records with respect to preemptions and non-clearances by their affiliates and O&Os and that such records and data go back many years. NASA and NAB believe that access to information regarding the clearance and preemption practices of O&Os and affiliates both today and ten years ago may assist in addressing the issues raised in the Notice with respect to the national television ownership rule. Accordingly, we hereby request that the Commission solicit information from the networks with respect to the amount of network programming preempted or otherwise not cleared by affiliates and O&Os in the top 25 markets in 2001 and in 1991. Specifically, NASA and NAB request that the Commission issue the following request to each of the networks:

For each television station affiliated with your network – including both O&Os and independently-owned affiliates – in the top 25 television markets as currently defined by Nielsen, please provide the total number of hours of programming offered generally by your network to affiliates and O&Os for broadcast on a network basis that was preempted by the station or otherwise not cleared by the station (e.g., because it declined to accept a program series, because it historically did not air network programming in a particular time period, etc.). The data should be broken out station-by-station, market-by-market.

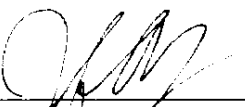
The requested data should be provided for calendar year 2001 and for calendar year 1991. The data for both years should be provided for the markets currently defined by Nielsen as the top 25 television markets. If you do not have records dating back to calendar year 1991, please explain and provide the requested data for the earliest calendar year for which you do have records. If your records are not kept on a calendar year basis, please select a 12 month period approximating the calendar year.

Please include with your submission an explanation of the methodology used to track and collect the requested data.


NASA and NAB respectfully request that the Commission issue this request to the three networks as soon as reasonably possible and ask for a response as soon as reasonably

possible. NASA and NAB will then promptly analyze these data and, as appropriate, submit an appropriate analysis to the Commission. We do not intend to seek an extension of any general deadlines to accommodate filings based on these data, but we realize that the preparation and analysis of this information may or may not be completed prior to these general deadlines. We also recognize that other parties might legitimately wish to comment on any such filing. We would be pleased to confer with network officials about facilitating the preparation and exchange of the requested data.

Respectfully submitted,



Jonathan D. Blake
Jennifer A. Johnson
COVINGTON & BURLING
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(202) 662-6000 – Phone
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HUMPHREY & LEONARD
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(919) 839-0300 – Phone
(919) 839-0304 – Fax

*Counsel for the Network Affiliated
Stations Alliance*

November 25, 2002

Courtesy copies to: Susan Fox, Esq., The Walt Disney Company
F. William LeBeau, Esq., National Broadcasting Company, Inc.
Anne Lucey, Esq., Viacom Inc.

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
2002 Biennial Regulatory Review – Review of the)	MB Docket No. 02-277
Commission’s Broadcast Ownership Rules and)	
Other Rules Adopted Pursuant to Section 202 of)	
the Telecommunications Act of 1996)	
)	
Cross-Ownership of Broadcast Stations and)	MM Docket No. 01-235
Newspapers)	
)	
Rules and Policies Concerning)	MM Docket No. 01-317
Multiple Ownership of Radio Broadcast)	
Stations in Local Markets)	
)	
Definition of Radio Markets)	MM Docket No. 00-244

ORDER

Adopted: December 30, 2002

Released: December 31, 2002

By the Chief, Media Bureau:

1. On September 12, 2002, the Commission adopted a Notice of Proposed Rulemaking (“Notice”),¹ which began this 2002 biennial review of its broadcast ownership rules. On November 25, 2002, the Network Affiliated Stations Alliance (“NASA”) and the National Association of Broadcasters (“NAB”) filed a Request for Collection of Data by the FCC asking the Commission to request certain data from the ABC, CBS, and NBC television networks in the above-captioned proceeding.² Specifically, the parties ask that the Commission request from these networks information regarding the amount of network programming preempted or otherwise not cleared by affiliates and network owned-and-operated stations in the top 25 markets in 2001 and 1991.³ NASA and NAB assert that this information may assist them in addressing the issues raised in the *Notice* regarding the national television ownership rule.⁴

2. Although we expect and encourage the networks to submit data on all relevant issues raised in the *Notice*, we decline to compel production of the specific data identified by NASA and NAB. The scope of the questions asked in the *Notice* is broad enough to encompass the preemption information

¹ 2002 Biennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, Cross-Ownership of Broadcast Stations and Newspapers, Rules and Policies Concerning Multiple Ownership of Radio Broadcast Stations in Local Markets, Definition of Radio Markets, 17 FCC Rcd 18503 (2002).

² NASA/NAB Request for Collection of Data by FCC (Nov. 25, 2002) (“NASA/NAB Request”).

³ *Id.* at 2.

⁴ *Id.*

sought.⁵

3. Moreover, even if the *Notice* had not already sought information regarding preemption, we would be concerned that grant of the NASA/NAB Request would unnecessarily delay this proceeding.⁶ The *Notice* was released on September 23, 2002, and specified a 60-day comment period and 30-day reply comment period.⁷ The Commission delayed the beginning of the filing periods until release of the Media Ownership Working Group studies,⁸ on October 1, 2002.⁹ The Bureau subsequently extended the filing deadlines to give parties an additional 30 days to file their comments and reply comments.¹⁰ Grant of the NASA/NAB request at this late date likely would result in an additional delay because of the time required for: (1) the Commission to formally request more specific data; (2) the networks' response; and (3) the public to analyze and comment upon the response.

4. Accordingly, because the *Notice* already seeks information regarding preemption, and in light of concerns that we not unnecessarily delay the proceeding, we conclude that the public interest would not be served by grant of NASA's and NAB's request. IT IS ORDERED THAT the NASA/NAB Request IS DENIED.

FEDERAL COMMUNICATIONS COMMISSION

W. Kenneth Ferree
Chief, Media Bureau

⁵ See *Notice*, 17 FCC Rcd at 18550-51, ¶¶ 149-53.

⁶ Several parties have expressed similar concerns regarding delay in resolving the issues raised in the *Notice*. See, e.g., Opposition of the Newspaper Association of America to Further Request for Extension of Time (Dec. 16, 2002); Opposition of Media General, Inc. to Motion for Revision of Procedural Dates (Oct. 21, 2002).

⁷ *Notice*, 17 FCC Rcd at 18555, ¶ 169

⁸ *Id.*

⁹ *FCC Seeks Comment on Ownership Studies Released by Media Ownership Working Group and Establishes Comment deadlines for 2002 Biennial Regulatory Review of Commission's Ownership Rules*, 17 FCC Rcd 19140 (2002).

¹⁰ See *2002 Biennial Regulatory Review*, DA 02-2989, MB Docket No. 02-277 (rel. Nov. 5, 2002) ¶ 4.

ATTACHMENT 4

Congress of the United States
Washington, DC 20515

June 29, 2001

The Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Dear Chairman Powell:

We oppose any effort to increase the national broadcast ownership cap. Two of the hallmark principles of the Communications Act are localism and diversity, and our uniquely American form of broadcasting, with its combination of national networks and local, independently-owned and -operated broadcast outlets, reflects these core principles. We are committed to making sure that as the media industry evolves and consolidates, the voice of local broadcasters is not stifled or silenced. The national ownership cap at its current level serves a critical role in preserving localism.

We believe that the 35 percent cap should remain where Congress established it in the law, and we write to urge the Commission not to increase the cap and to vigorously defend this provision as it comes under fire before the Commission and in the courts. We believe that the voice of the local station will become ever more meaningful to our communities, especially for that segment of the population that does not subscribe to pay television, as the broadcast television industry transitions to digital technology and its ability to serve local communities is enhanced. It is for this reason that we oppose any increase in the current 35 percent national television ownership cap that Congress adopted, after lengthy debate on the floor of both the House and Senate, as part of the Telecommunications Act of 1996.

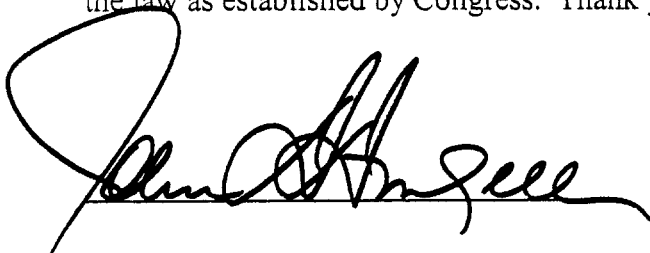


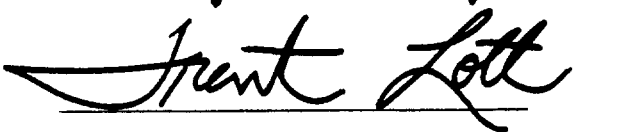
Challenges brought by the broadcast television networks against the national television ownership cap lack merit and we believe the Commission has an obligation to vigorously defend the cap against such challenges. In our view, the D.C. Circuit's recent holdings in litigation surrounding cable ownership caps simply establish that (1) Congress acted constitutionally when it set limits on ownership of media properties in order to preserve competition and promote diversity in ideas and speech; and (2) the FCC did not adequately justify the particular numerical limitation it set on cable networks in its rule. The D.C. Circuit did not find that the Commission could not promulgate limitations with regard to media ownership. In writing the Telecommunications Act of 1996, Congress itself set the national television ownership cap and incorporated it in the statute for the same reasons the court found to be important governmental interests in the recent litigation addressing the cable ownership cap: to promote diversity in ideas and speech and preserve competition.

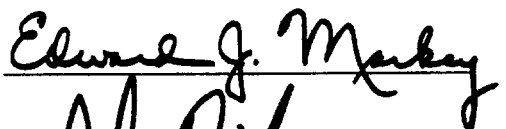
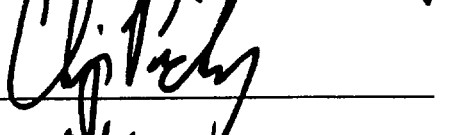
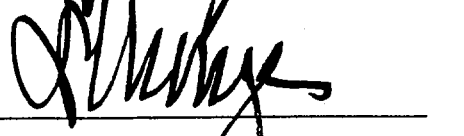
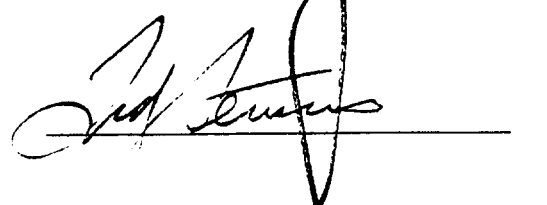
Moreover, the time is not right for a change in the national ownership cap. In recent years the Commission has altered a number of rules affecting the broadcast industry, from the dual network rule to the duopoly rule to the financial interest and syndication rule. Because these rules are related and interact in their impact on local broadcasting, the Commission should take sufficient time to observe the effects of those recent changes and assess their impact on diversity and competition before considering any alteration to the national limit.

The national ownership cap is vital to ensuring that television programming decisions remain in the hands of local broadcasters, and that media power does not become concentrated in New York or Los Angeles. The national broadcast ownership cap is not, as some wrongly suggest, just about competition. Local input helps keep our broadcast system responsive to the views of local communities across the country. That diversity of viewpoint benefits our democracy. The national ownership cap also ensures that the delicate balance of power in the network-affiliate partnership is maintained. We think that recent controversy regarding the scope of the networks' power even under the current regulatory regime underscores the notion that retention of the 35% national television ownership cap remains essential to prevent potential abuses.

We urge the Commission to honor its statutory responsibility to facilitate a robust system of locally-based broadcasting not equaled anywhere in the world by maintaining and enforcing the law as established by Congress. Thank you for your time and attention to this matter.

Sincerely,

Bryan L. Egan

Max Cleland

John Edwards

David E. Bonior

Jerse Helms

Barbara Boker

cc: Commissioner Gloria Tristani
Commissioner Kathleen Abernathy
Commissioner Michael Copps

ATTACHMENT 5



1800 N. Providence Road, #206, Columbia, MO 65202
Telephone: (573) 442-5154. Fax: (573) 442-5156

AUG 21 2000

August 15, 2000

The Honorable Congressman Ike Skelton
House of Representatives
2206 Rayburn HOB
Washington DC 20515-2504

Dear Congressman Skelton

There's a matter of utmost importance to MDA, the agency that annually broadcasts the premier televised fund-raising event for charity in America—our annual Jerry Lewis MDA Telethon — that deserves your attention. I'm speaking of the current debate over raising the cap on network ownership of local over-the-air broadcast television stations from 35% to 50% of the nation.

The impact of such a raise of the cap would be catastrophic to our Telethon, the single most important fund-raising vehicle of this Association, around which the bulk of our annual fund-raising effort is built. To say it's difficult *now* to hold our *ad hoc* network together in the face of the pressure the major networks are placing on their affiliates is an understatement. As it is there are virtually no network owned and operated local stations that carry the Telethon. Raising the cap to 50% would mean only one thing to MDA, more O&O's in more major markets, with the unfortunate result being more of the top stations in these markets dropping the Telethon so as to not preempt their owners' network programming Labor Day weekend. Our only alternative in those markets would be to clear the show on smaller independent stations, an action that would mean a devastating diminution of audience and revenues. This potential loss of revenue isn't just an abstract concept. Without the funds raised annually by the Telethon MDA would be unable to continue its lifesaving mission on behalf of those who depend on MDA for help and hope.

Congressman Ike Skelton, keeping the cap at 35% could literally mean the difference between our Telethon continuing as a viable fund-raiser or the unthinkable alternative of the Telethon fading into history as network owned stations systematically drop the show at the direction of network program executives. Your weighing in *against* raising the cap to 50% would be advocating for the millions of Americans who will benefit from the ultimate accomplishments of the Telethon's goal — the defeat of neuromuscular diseases.

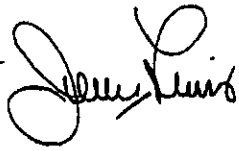
Sincerely,

Ken Sieve
District Director

Muscular Dystrophy Association
JERRY LEWIS, National Chairman

Dedicated to the eradication of the muscular dystrophies, amyotrophic lateral sclerosis (Lou Gehrig's disease), myasthenia gravis, the spinal muscular atrophies, Friedreich's ataxia and a host of other neuromuscular diseases
www.mdausa.org

ATTACHMENT 6



January 29, 2001

COPY

Michael Powell
Chairman, Federal Communications
Commission
Washington, D C 20554

Dear Chairman Powell

Congratulations on your appointment as Chairman of the FCC!

Before you even begin to settle in to your new post I want to bring to your attention a matter of tremendous importance to me and MDA, the cause I've headed for nearly 50 years which annually broadcasts the biggest televised fund-raising event for charity in America -- our MDA Labor Day Telethon. I'm speaking of the possibility that the FCC might raise the cap on network ownership of local television stations beyond the current coverage limit of 35%.

Jacking up the cap would be catastrophic to our Telethon, the single most important fund-raising effort of our Association, around which everything else we do in fund-raising is built. To say it's difficult *now* to hold our once-a-year network together in the face of the pressure the major networks are placing on their affiliates that carry the Telethon is an understatement. As it is, virtually no network owned and operated local stations are permitted to carry the Telethon. On top of that, the major networks are now forcing their affiliates at contract renewal time to accept "no preemption" clauses that will force *even independently owned* network-affiliated stations to drop the Telethon. We're facing this situation for Telethon 2001 in Minneapolis/St. Paul and having a hard time clearing the Telethon in Des Moines for the same reason.

The elimination of public service broadcasting requirements launched the crisis we're now facing with the major networks' "no preemption" policies. Raising the cap would mean only one thing to MDA. With more O&O's in more major markets the end result would be that more top stations would be forced by their network chiefs to drop the Telethon. The only thing we can do is move the show to smaller independent stations, something that would devastate our audience and income. This loss would mean fewer clinics, less research and far less hope for "my kids."

Keeping the cap at 35% could mean the difference between our Telethon continuing to do its lifesaving job or fading into history as network-owned and other top stations drop the show at the direction of network executives. Your weighing in *against* raising the cap could make all the difference to "my kids" and the million other Americans who count on the accomplishment of the Telethon's goal -- the defeat of neuromuscular diseases.

I look forward to hearing from you.

Sincerely,

P S Prominently displayed at MDA national headquarters is a photo of your Dad taken in '93 when, as Chairman of the Joint Chiefs, he graciously received our then national poster child, Lance Fallon. It's really good to see your Dad back helping to lead our government.

ATTACHMENT 7

**Television Stations Owned By Companies
Associated With The Big Four Networks**

RANK	DESIGNATED MARKET AREA	TV HOUSEHOLDS	% OF U.S.	VIACOM	FOX ENTERTAINMENT GROUP	GENERAL ELECTRIC	THE WALT DISNEY CO.
1	New York	7,282,320	6.829	WCBS (Ch. 2, CBS)	WNYW (Ch. 5, FOX) WWOR (Ch. 9, UPN)	WNBC (Ch. 4, NBC) WNJU (Ch. 47, Tele.)	WABC (Ch. 7, ABC)
2	Los Angeles	5,318,040	4.987	KCBS (Ch. 2, CBS) KCAL (Ch. 9, Indep.)	KCOP (Ch. 13, UPN) KTTV (Ch. 11, FOX)	KNBC (Ch. 4, NBC) KVEA (Ch. 52, Tele.) KWHY (Ch. 22, Tele.)	KABC (Ch. 7, ABC)
3	Chicago	3,351,330	3.143	WBBM (Ch. 2, CBS)	WFLD (Ch. 32, FOX) WPWR (Ch. 50, UPN)	WMAQ (Ch. 5, NBC) WSNS (Ch. 44, Tele.)	WLS (Ch. 7, ABC)
4	Philadelphia	2,830,470	2.654	KYW (Ch. 3, CBS) WPSG (Ch. 57, UPN)	WTFX (Ch. 29, FOX)	WCAU (Ch. 10, NBC)	WPVI (Ch. 6, ABC)
5	San Francisco-Oak-San Jose	2,436,220	2.284	KPIX (Ch. 5, CBS)		KNTV (Ch. 11, NBC) KSTS (Ch. 48, Tele.)	KGO (Ch. 7, ABC)
6	Boston (Manchester)	2,353,500	2.207	WBZ (Ch. 4, CBS) WSBK (Ch. 39, UPN)	WFXT (Ch. 25, FOX)	WPXB (Ch. 60, Tele.)	
7	Dallas-Ft. Worth	2,195,540	2.059	KTVT (Ch. 11, CBS) KTXA (Ch. 21, UPN)	KDFW (Ch. 4, FOX) KDFI (Ch. 27, Indep.)	KXTX (Ch. 39, Tele.)	
8	Washington, DC (Hagrstwn)	2,169,230	2.034		WDCA (Ch. 20, UPN) WTTG (Ch. 5, FOX)	WRC (Ch. 4, NBC)	
9	Atlanta	1,971,180	1.848	WUPA (Ch. 69, UPN)	WAGA (Ch. 5, FOX)		
10	Detroit	1,899,910	1.782	WKBD (Ch. 50, UPN) WWJ (Ch. 62, CBS)	WJBK (Ch. 2, FOX)		
11	Houston	1,814,140	1.701		KRIV (Ch. 26, FOX) KTXH (Ch. 20, UPN)	KTMD (Ch. 48, Tele.)	KTRK (Ch. 13, ABC)
12	Seattle-Tacoma	1,659,100	1.556	KSTW (Ch. 11, UPN)			
13	Tampa-St. Pete (Sarasota)	1,620,110	1.519	WTOG (Ch. 44, UPN)	WTVT (Ch. 13, FOX)		
14	Minneapolis-St. Paul	1,594,740	1.495	WCCO (Ch. 4, CBS) KCCO (Ch. 7, CBS) (Satellite of WCCO) KCCW (Ch. 12, CBS) (Satellite of WCCO)	WFTC (Ch. 29, FOX) KFTC (Ch. 26, FOX) (Satellite of WFTC) KMSP (Ch. 9, UPN)		
15	Cleveland-Akron (Canton)	1,528,840	1.434		WJW (Ch. 8, FOX)	WKYC (Ch. 3, NBC)	

RANK	DESIGNATED MARKET AREA	TV HOUSEHOLDS	% OF U.S.	VIACOM	FOX ENTERTAINMENT GROUP	GENERAL ELECTRIC	THE WALT DISNEY CO.
16	Phoenix	1,524,130	1.429		KSAZ (Ch. 10, FOX) KUTP (Ch. 45, UPN)		
17	Miami-Ft. Lauderdale	1,486,860	1.394	WBFS (Ch. 33, UPN) WFOR (Ch. 4, CBS)		WTVJ (Ch. 6, NBC) WSCV (Ch. 51, Tele.)	
18	Denver	1,366,250	1.281	KCNC (Ch. 4, CBS)	KDVR (Ch. 31, FOX) KFCT (Ch. 22, FOX)	KMAS (Ch. 24, Tele.)	
19	Sacramnto-Stktn-Modesto	1,227,600	1.151	KMAX (Ch. 31, UPN)			
20	Orlando-Daytona Bch-Melbrn	1,224,470	1.148		WOFL (Ch. 35, FOX) WRBW (Ch. 65, UPN)		
21	Pittsburgh	1,165,660	1.093	WNPA (Ch. 19, UPN) KDKA (Ch. 2, CBS)			
22	St. Louis	1,156,370	1.084		KTVI (Ch. 2, FOX)		
24	Baltimore	1,060,450	0.994	WJZ (Ch. 13, CBS)	WUTB (Ch. 24, UPN)		
25	Indianapolis	1,019,870	0.956	WNDY (Ch. 23, UPN)			
27	Hartford & New Haven	980,410	0.919			WVIT (Ch. 30, NBC)	
29	Raleigh-Durham (Fayetteville)	929,460	0.872			WNCN (Ch. 17, NBC)	WTVD (Ch. 11, ABC)
31	Milwaukee	860,350	0.807		WITI (Ch. 6, FOX)		
33	Kansas City	852,510	0.799		WDAF (Ch. 4, FOX)		
34	Columbus, OH	835,780	0.784	WWHO (Ch. 53, UPN/WB)		WCMH (Ch. 4, NBC)	
36	Salt Lake City	769,230	0.721	KUTV (Ch. 2, CBS) KUSG (Ch. 12, CBS) (Satellite of KUTV)	KSTU (Ch. 13, FOX)		
37	San Antonio	718,730	0.674			KVDA (Ch. 60, Tele.)	
39	West Palm Beach-Ft. Pierce	700,850	0.657	WTVX (Ch. 34, UPN/WB)			
40	Birmingham (Ann and Tusc)	690,030	0.647		WBRC (Ch. 6, FOX)	WVTM (Ch. 13, NBC)	
41	Norfolk-Portsmouth-Newport News	677,610	0.635	WGNT (Ch. 27, UPN)			
42	New Orleans	658,830	0.618	WUPL (Ch. 54, UPN)			
43	Memphis	653,840	0.613		WHBQ (Ch. 13, FOX)		

RANK	DESIGNATED MARKET AREA	TV HOUSEHOLDS	% OF U.S.	VIACOM	FOX ENTERTAINMENT GROUP	GENERAL ELECTRIC	THE WALT DISNEY CO.
45	Oklahoma City	636,970	0.597	KAUT (Ch. 43, UPN)			
46	Greensboro-H.Point-W.Salem	634,140	0.595		WGHP (Ch. 8, FOX)		
48	Providence-New Bedford	624,020	0.585	WLWC (Ch. 28, UPN/WB)		WJAR (Ch. 10, NBC)	
54	Austin	552,060	0.518	KEYE (Ch. 42, CBS)	KTBC (Ch. 7, FOX)		
57	Fresno-Visalia	519,330	0.487			KNSO (Ch. 51, Tele.)	KFSN (Ch. 30, ABC)
64	Flint-Saginaw-Bay City	466,510	0.437				WJRT (Ch. 12, ABC)
68	Toledo	432,770	0.406				WTVG (Ch. 13, ABC)
69	Green Bay-Appleton	418,580	0.393	WFRV (Ch. 5, CBS)			
74	Tucson (Sierra Vista)	399,800	0.371			KHRR (Ch. 40, Tele.)	
83	Huntsville-Decatur (Flor)	359,260	0.337	WHDF (Ch. 15, UPN)			
162	Gainesville	116,380	0.109		WOGX (Ch. 51, FOX)		
177	Marquette	88,040	0.083	WJMN (Ch. 3, CBS) (Satellite of WFRV)			
	TOTAL ALL COMPANIES	65,831,820	61.726				
	TOTAL Viacom	48,160,380	45.160				
	*with UHF discount	42,561,785	39.911				
	TOTAL Fox	47,389,560	44.437				
	*with UHF discount	40,331,065	37.819				
	TOTAL General Electric	38,911,170	36.488				
	*with UHF discount	33,611,815	31.632				
	TOTAL Disney	25,380,590	23.800				
	*with UHF discount	25,120,925	23.557				

Sources: Nielson Media Research's Local Universe Estimates for 2002-2003 at <http://www.nielsonmedia.com/DMAS.html> (last visited Jan. 1, 2003).

Television and Cable Factbook 2002 and updates.

ATTACHMENT 8

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
Federal Communications Commission
Washington, D.C.

In the matter of)	
)	
2002 Biennial Regulatory Review – Review of the)	MB Docket No. 02-277
Commissions' Broadcast Ownership Rules and)	
Other Rules Adopted Pursuant to Section 202 of)	
the Telecommunications Act of 1996)	
)	
Cross-Ownership of Broadcast Stations and)	MM Docket No. 01-235
Newspapers)	
)	
Rules and Policies Concerning Multiple)	MM Docket No. 01-317
Ownership of Radio Broadcast Stations)	
in Local Markets)	
)	
Definition of Radio Markets)	MM Docket No. 00-244

To: The Commission

**EARLY SUBMISSION OF THE NATIONAL ASSOCIATION OF BROADCASTERS
AND THE NETWORK AFFILIATED STATIONS ALLIANCE**

The Network Affiliated Stations Alliance ("NASA"), a coalition of the associations representing stations affiliated with (but not owned by) the ABC, CBS and NBC television networks, and the National Association of Broadcasters ("NAB") submit an analysis of the Media Ownership Working Group Study titled "The Measurement of Local Television News and Public Affairs Programs" (October 1, 2002). We file these comments early due to the importance of the topic, and our understanding that the FCC staff is interested in early input on this study.

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List A B C D E

Respectfully submitted,

NETWORK AFFILIATED STATIONS ALLIANCE

NATIONAL ASSOCIATION OF BROADCASTERS



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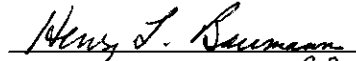
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December 9, 2002

**“THE MEASUREMENT OF LOCAL TELEVISION NEWS AND
PUBLIC AFFAIRS PROGRAMS”
ANALYSIS OF MEDIA OWNERSHIP WORKING GROUP STUDY**

I. SUMMARY

The Media Ownership Working Group released a study suggesting that network-owned stations produce more and better quality news programs than independent affiliates. See Thomas C. Spavins, Loretta Denison, Scott Roberts, & Jane Frenette, “The Measurement of Local Television News and Public Affairs Programs.” (October 1, 2002). The study used flawed data and methodology, and thus its conclusions are invalid.

The most significant shortcoming of the study is its failure to hold constant the size of the market, which affects the amount and type of news programs aired by network and affiliate-owned stations. This kind of failure is a common pitfall in empirical studies. In his economics textbook, Nobel laureate Paul Samuelson cautions: “Budding economists must also be alert to common fallacies in economic reasoning. Because economic relationships are often complex, involving many different variables, it is easy to become confused about the exact reason behind events or the impact of policies on the economy.”¹ Dr. Samuelson goes on to identify one such “common fallacy” in economic reasoning: the “failure to hold other things constant when thinking about an issue.”²

The study’s failure to hold other things constant undercuts every section. The networks own a disproportionate number of stations in the top markets. Seventy percent of network stations in the top-10 markets are O&O stations. Failing to hold constant the effect of market size on the number of hours of local news aired, and other methodological problems, accounts for the erroneous conclusion that network stations air more local news programs. And the same failing explains the erroneous conclusion that network stations air shows of higher quality, because network-owned stations in large, urban markets receive more news awards than independent stations in smaller, less densely-populated markets. Nearly 50 percent of the Dupont Silver Baton awards went to stations in the top 10 markets. Yet in the top 10 markets, affiliates out-performed network-owned stations for the receipt of the Dupont awards for local news excellence in broadcasting.

There are other methodological and data mistakes in the study that raise additional serious questions about its reliability. First, Fox stations (O&O and Affiliate) are clearly outliers with a remarkable variation in hours of news programs when compared with the other networks. Second, the data set erroneously labeled the NBC station in San Francisco as owned by NBC, when at the time of the study (November 2000) Young Broadcasting owned that station. Third, the local news data set included a WB station in San Francisco; an independent station, KTVK, in Phoenix; another independent station, WABM, in Birmingham; four stations in Orlando where

¹ Samuelson, P. and Nordhaus, W.D., *Economics*, 13th ed., 2001, p 5.

² *Id.* at 6.

there is no network owned station; and four stations in Marquette (the 177th market) that cannot be compared with stations in the top markets (the second closest market included in the study is Green Bay, the 66th market). Fourth, the study of Edward R. Murrow and Dupont awards includes awards to stations in the top four markets (New York, Chicago, Los Angeles, and Philadelphia), where there are no independently-owned affiliates of the major networks. For this reason, the study excluded these markets in its examination of news and public affairs programming. Moreover, the study includes awards for "Web Site," which is not broadcasting. The sum of all the methodological and data mistakes account for the incorrect conclusion that O&O stations do a better job of producing news programs of interest to the local community.

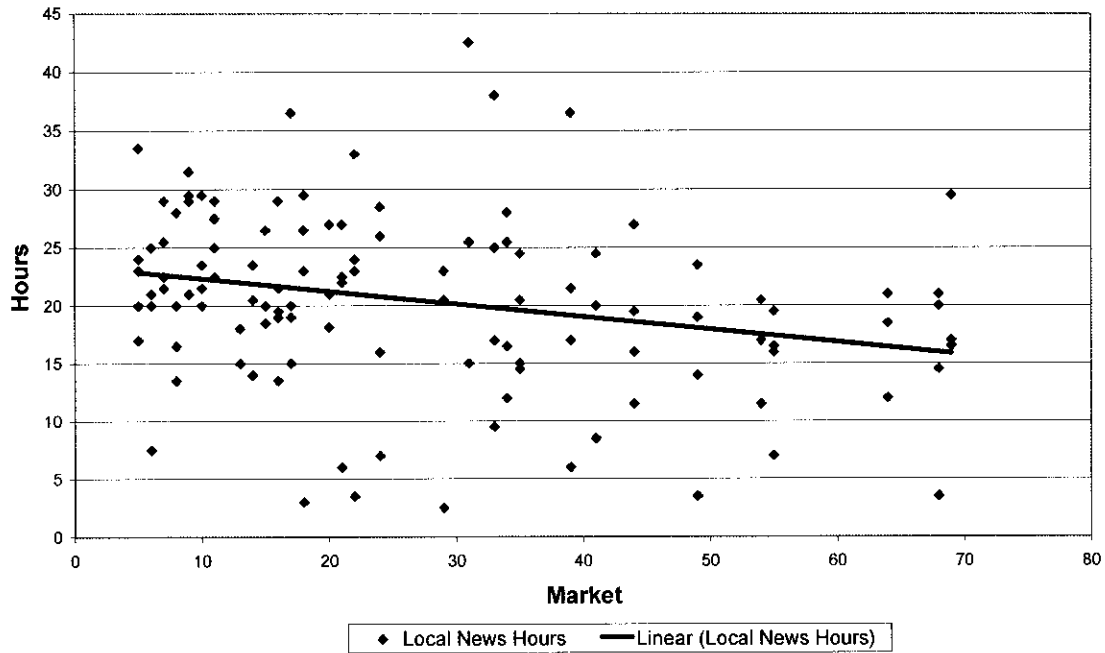
II. FLAWS IN THE NETWORK SERVED MARKET STUDY SECTION

A. The Study Failed To Hold Constant Market Size.

The most debilitating flaw in the study is its failure to hold constant other factors that might explain the differences in local news. The study purports to show that Network O&O's provide, on average, 4.3 more hours of local news and public affairs programming per week than affiliates. From this observation, the study concludes that the data show that O&Os "produce, on average, a greater quantity of local news and public affairs programming than affiliates in markets where the two station types compete directly." In fact, this conclusion is unsupported by the study's own data.

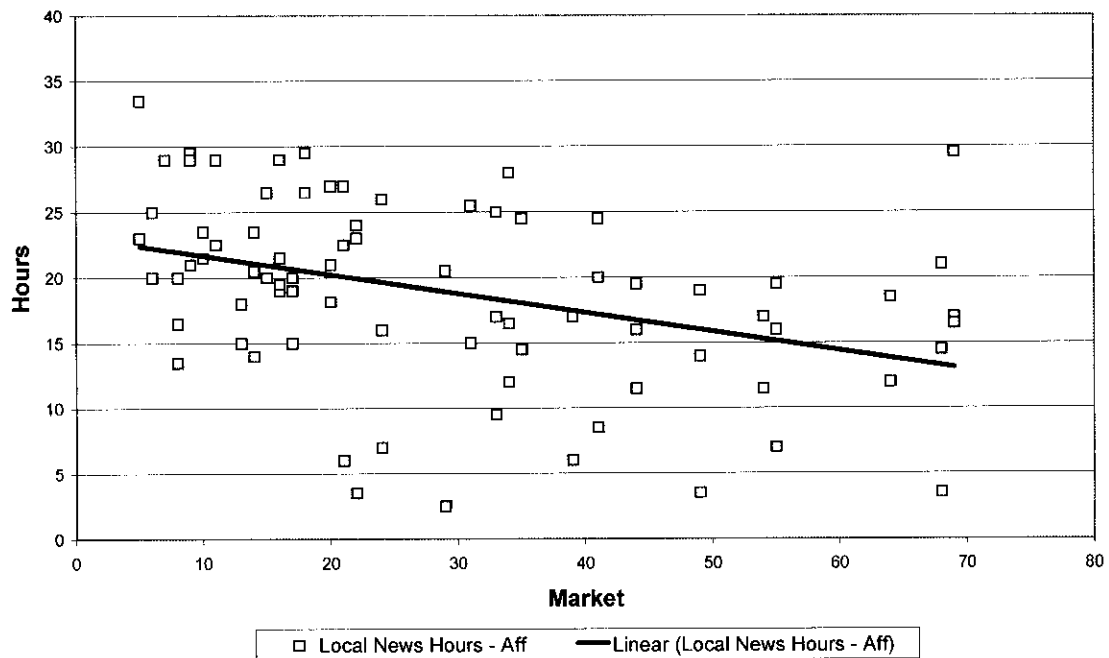
The data show that stations in larger markets air, on average, more local news than stations in smaller markets. This is evident by graphing local news against market rank. Figure 1 below graphs market rank against the total hours of local news programming. The larger the market rank, the smaller the size of the market (i.e., New York has a market rank of 1, whereas Green Bay a market rank of 66). A simple regression analysis would show that there is a statistically significant correlation between the market rank and the hours of local news.

Figure 1



The correlation between hours of local news and the size of the market is not driven by the presence, or absence, of network O&O's. Figure 2 shows the same correlation exists when the O&O stations are removed.

Figure 2



B. Inclusion of Fox

A second serious flaw with the study arises from the inclusion of Fox stations in the sample study.³

If the data showed that O&O stations achieved higher ratings or showed more local news than affiliates, one should not on this basis alone conclude that network-owned stations outperform affiliates. An equally plausible inference from the data is that the network, in deciding what stations to own, will chose stations with strong news programs and local ratings. This is called the “selectivity-bias problem” in the economic literature.⁴

In contrast with ABC, CBS, and NBC, Fox has acquired many of its stations only recently. By our estimate, Fox has acquired close to 40 percent of its current stations in 2001 or 2002, and at the time of the analysis (Nov. 2000), most of the Fox-owned stations included in the study were similarly recently acquired. One would anticipate that an important consideration for Fox in acquiring those stations was the existence, or absence, of a strong local news presence. Because the Fox stations may seriously bias the results, including the Fox stations in the study is inappropriate.

Moreover, Fox affiliates are in a transition stage. Formerly independent stations are now affiliated with a national network. This transition makes the stations stronger, but the transformation is yet incomplete. Even a cursory examination of the data shows that Fox stations are different; its stations are all over the map in the hours of local news programming aired. In the study’s data set, the total hours of local news for Fox ranges from 2.5 hours in Raleigh-Durham to 42.5 hours in Kansas City. Seven Fox stations air fewer than 7 hours of local news, while five Fox stations air more than 30 hours.

³ We also question the validity of including the WB station in San Francisco, and the independent stations in Phoenix and Birmingham.

⁴ See, e.g., G.S. Maddala, *Limited-Dependant and Qualitative Variables in Econometrics*, Cambridge Univ. Press, 1983, p. 257-90 (“There are many problems in which the data we have are generated by individuals making choices of belonging to one group or another (i.e., by individual self-selection.”).

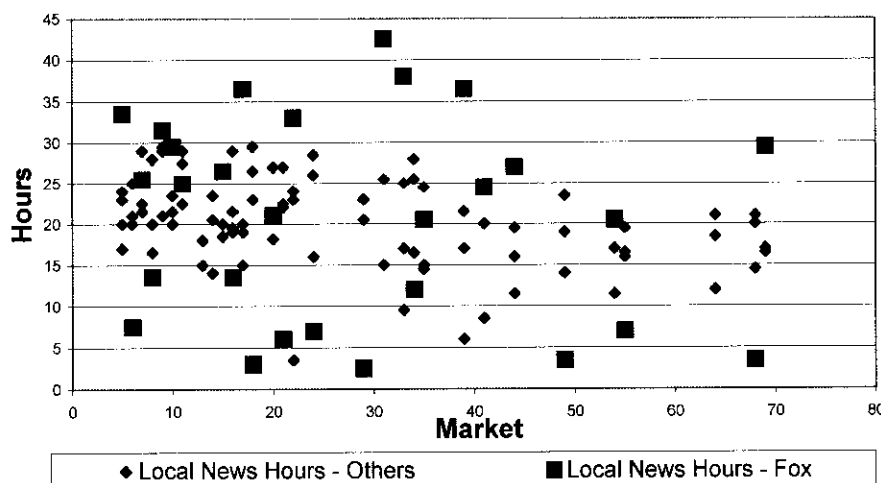
Analysis of the variation of the hours of news programming reveals that news programming hours for Fox stations deviate widely in comparison with the other networks.

Table 1

Descriptive Statistics Total Hours of Local News					
	All Stations	FOX	ABC	CBS	NBC
Mean	20.3	20.7	18.9	19.3	21.8
Standard Deviation	7.4	12.4	5.8	4.7	5.0
Minimum	2.5	2.5	3.5	6.0	11.5
Maximum	42.5	42.5	29.5	28.5	29.5
Number of Stations	126	28	32	32	32

Comparing the Fox stations to the other network stations reveals the clear discrepancy. The differences are apparent in Figure 3 below. This chart illustrates that the number of hours of local news aired at Fox stations (in red) fluctuates widely in comparison to the tighter pattern of the other network stations (both O&O and affiliates).

Figure 3



Given the apparent discrepancies between Fox stations (both O&O and affiliates) and NBC, CBS, and ABC stations, the transitional nature of many of Fox's previously independent stations, and the likelihood that Fox recently selected the majority of the stations it owns based, in part, on the pre-existing strength of their news presence, we question the validity of any comparison analysis that includes the Fox stations.

C. Revised Analysis

These methodology problems with the study are important. If one controls for other factors that influence the number of news hours, such as market size, and excluded the abnormal Fox stations, the correlation detected by the study's authors vanishes.

1. Total Hours Comparision

The data reveal no statistically significant difference between the hours of local news aired by affiliates and O&O stations. Using Excel, we ran a regression analysis to reveal the impact of network ownership and market rank on the hours of local news.⁵ Using the study's data, we included all NBC, ABC, and CBS stations in markets where at least one station was owned by ABC, CBS, or NBC, and there was at least one affiliate. (See Appendix A). The results, presented below, reveal that all stations in large markets air more local news. But having controlled for that relationship, the data show no statistically significant difference between the hours of local news aired by affiliates and O&O stations.⁶

Table Two
(Total Hours of Local News)

	<i>Coefficients</i>	<i>Standard Error</i>	<i>t Stat</i>	<i>P-value</i>
Intercept	23.00	1.11	20.71	0.0000
Mkt rank	-0.10	0.03	-3.82	0.0003
O&O	1.12	1.13	0.99	0.3242

Dependent Variable: "Local News Hours"

2. Ratings Comparision

We performed a similar regression analysis to explain the impact of network ownership and market size on news ratings. Based on experience, we expected the data to show two phenomena: first, that ratings decrease as the market gets bigger due to the fractionation of the market; and second, that O&O's will achieve lower ratings holding the market rank constant. The results of the multivariate regression analysis are presented below.

⁵ This multivariate regression analysis is a simple tool used by economists to hold other factors constant. See William H. Green, *Econometric Analysis*, 2d ed., 1993, p. 140-43.

⁶ The regression analysis is sensitive to the inclusion of the abnormal Fox stations (particularly the dozen stations with hours of news below 7 or above 30). If you include these Fox stations, then the same regression analysis will show a statistically significant difference between the hours of local programming shown by O&O stations. But, as shown above, this result is driven entirely by the Fox stations. The most the study's data suggest, then, is that in November of 2000, some Fox-owned affiliates aired many more hours of local news than its independently-owned stations.

Table Three

Local News Ratings (5:30 p.m.)

	<i>Coefficients</i>	<i>Standard Error</i>	<i>t Stat</i>	<i>P-value</i>
Intercept	7.21	0.70	10.27	0.000
Mkt rank	0.01	0.02	0.39	0.696
O&O	-0.10	0.73	-0.14	0.889

Dependent Variable: "5:30 p.m. rtg"

Table Four

Local News Ratings (6:00 p.m.)

	<i>Coefficients</i>	<i>Standard Error</i>	<i>t Stat</i>	<i>P-value</i>
Intercept	6.965	0.90	7.77	0.000
Mkt rank	0.026	0.02	1.24	0.221
O&O	-0.004	0.91	0.00	0.997

Dependent Variable: "6:00 p.m. rtg"

The results are ambiguous (not "statistically significant"), but the estimated coefficients suggest that ratings decrease for larger markets, and that O&O's achieve lower ratings on average than affiliates.

III. FLAW WITH THE NEWS AND PUBLIC AFFAIRS AWARDS SECTION

The failure to "hold other factors constant" also undermines the study's analysis of the news and public affairs awards. The study looked at the number of Dupont and Edward R. Murrow awards from 1991 through 2002. Reporting the results as an index, the authors concluded that, for example, network-owned stations were 3.37 times as likely to win a Dupont award, as are independently-owned stations. Because the assumptions underlying the methodology are deeply flawed, the author's conclusions are unreliable.

The key underlying assumption is that all stations in the various markets stand an equal chance of receiving a Murrow or Dupont award, but for the ownership of the station. If this assumption is invalid, the index calculated by the authors has no value. The reported index captures the success relative to the per-station average of awards in the sample base. It presumes that every station in the sample base stands an equal chance of winning an award.⁷ Seeing a large number of awards going to O&O stations, when compared to the percentage of O&O

⁷ The sample base of the RTDNA award index is the top 50 markets. So implicit in that index is the assumption that stations in Albuquerque-Sante Fe (the 50th market, with 570,000 households) compete on an even playing field with stations in New York, Los Angeles, and Chicago (with over three million households). The sample base for the Dupont award index is even larger: it encompasses all television markets. So that index presumes that stations in Cedar Rapid (with 300,000 households) and even stations in markets like Juneau or North Platte (with fewer than 25,000 households) compete equally for the Dupont awards with the top markets.

stations in the sample base, the authors conclude that “With respect to the receipt of awards for local news operations, network O&O’s outperform affiliates.”

However, stations in larger markets will win a greater proportion of Murrow and Dupont awards. In 2002 and 1992 respectively, WABC-TV in New York and KMML-TV in Cedar Rapids won the prestigious Dupont award, the self-acclaimed equivalent to the Pulitzer in broadcasting. The O&O station serves a market *twenty* times as large as Cedar Rapids, Iowa. One can only imagine the hugely different news-related resources and news opportunities of these two stations. It is not surprising that WABC-TV has won twice as many Dupont awards as KMML-TV; it is amazing that *David* beat *Goliath* at all.

Cursory examination of the Dupont awards reveals the magnitude of the mistake in the authors’ methodology. Our analysis focuses on the Dupont awards listed by the authors in Appendix C of their study, since it is here that the authors’ detected the largest difference between O&Os and affiliates. The table on the following page shows that stations in the larger markets dominate the Dupont awards. One may applaud the remarkable achievements of small, affiliate stations such as KMTW-TV in Auburn, Maine, KREM-TV in Spokane, Washington, and KOLD-TV in Tucson, Arizona. But they are the exception. Since 1991, *46 percent of the Dupont-Columbia Silver Baton Awards have gone to stations in the top 10 markets.*

Dupont-Columbia Silver Baton Awards

Station	O&O	City	Market Rank*	Television Households*	Title	Year	Cumulative Percentage
WABC-TV	X	New York	1	6,935,610	Caught Off Guard	2002	2.0%
WNET/PBS		New York	1	6,935,610	Taken In: The Lives of America's Foster	1999	4.0%
WABC-TV	X	New York	1	6,935,610	Room 194: The Overcrowding Crisis	1998	6.0%
WBAI/Pacifica		New York	1	6,935,610	Massacre: The Story of East Timor	1994	8.0%
KCBS-TV	X	Los Angeles	2	5,354,150	Poison Plant	2002	10.0%
KCET-TV/PBS		Los Angeles	2	5,354,150	The Great War & The Shaping of the 20th Century	1998	12.0%
KTTV	X	Los Angeles	2	5,354,150	Cops on Trial: The Rodney King Case	1993	14.0%
WMAQ-TV	X	Chicago	3	3,244,850	Strip Search at O'Hare	1999	16.0%
WBBM-TV	X	Chicago	3	3,244,850	Congressman William Lipinski's Primary Campaign	1999	18.0%
KRON-TV		San Francisco	5	2,431,720	In the Shadow of the Wall	1994	20.0%
KPIX-TV	X	San Francisco	5	2,431,720	Wards of the State	1992	22.0%
KQED-TV/PBS		San Francisco	5	2,431,720	Shield for Abuse	1991	24.0%
KCBS-AM		San Francisco	5	2,431,720	Earthquake	1991	26.0%
WCVB		Boston	6	2,242,240	Chronicle and Environmental Reporting	1993	28.0%
WFAA-TV		Dallas	7	2,069,010	News Report of Insurance Scandal	1997	30.0%
KERA-TV/PBS		Dallas	7	2,069,010	LBJ	1993	32.0%
WFAA-TV		Dallas	7	2,069,010	Coverage of the Gulf War	1992	34.0%
WMAL-AM		Washington, DC	8	2,047,340	American History - The Disney Version	1996	36.0%
WJLA-TV		Washington, DC	8	2,047,340	NFL Drug Testing: Illegal Procedure	1991	38.0%
WXYZ-TV		Detroit	9	1,873,620	Target 7: Michigan's Secret Soldiers	1996	40.0%
WTVS-TV/PBS		Detroit	9	1,873,620	The Last Hit: Children and Violence	1995	42.0%
WTVS-TV/PBS		Detroit	9	1,873,620	Who Killed Vincent Chin?	1991	44.0%
WTBS-TV/TBS	X	Atlanta	10	1,857,220	The Urban Gorilla	1992	46.0%
KHOU-TV		Houston, TX	11	1,747,350	Deadly Tires?	2001	48.0%
KIRO-TV		Seattle	12	1,605,900	Why the Orcas of Puget Sound Are Dying	2000	50.0%
KING		Seattle	12	1,605,900	America's Health Care Crisis	1991	52.0%
KTCA/PBS		St. Paul	13	1,510,130	Unisys	1998	54.0%
WCCO-TV	X	Minneapolis	13	1,510,130	Missing the Beat	1995	56.0%
KSTP		Minnesota	13	1,510,130	Who's Watching the Store	1993	58.0%
WEWS		Cleveland	15	1,488,270	Final Mission	1999	60.0%
WKYC-TV		Cleveland	15	1,488,270	Nightly Commentaries	1991	62.0%
WTVJ-TV	X	Miami	16	1,468,630	Haiti	1996	64.0%
WTVJ-TV	X	Miami	16	1,468,630	Coverage of Hurricane Andrew	1994	66.0%
WPLG-TV		Miami	16	1,468,630	Armed Enemies of Castro	1994	68.0%
KCNC-TV	X	Denver	18	1,312,300	Erin's Life	1993	70.0%
KBDI-TV/PBS		Denver	18	1,312,300	Tierra O Muerte: Land or Death	1992	72.0%
WBFF-TV		Baltimore	24	1,010,160	Justice on Trial: The Lost Generation	1994	74.0%
WBFF-TV		Baltimore	24	1,010,160	Finding the Lost Generation	1994	76.0%
WBFF-TV		Baltimore	24	1,010,160	The Walking Wounded	1994	78.0%
WTHR-TV		Indianapolis	26	974,390	Guarding the Guardians	2000	80.0%
WRAL-TV		Raleigh, NC	29	873,440	Series of Investigative Repots on Military	1999	82.0%
WCPO-TV		Cincinnati	32	828,650	I-Team Stadium Investigation	2001	84.0%
WCPO-TV		Cincinnati	32	828,650	Made in the USA?	1993	86.0%
KTVX-TV		Salt Lake City	36	732,380	Investigative Reporting of Olympics Bribery	1997	88.0%
WCBD-TV		Charleston, SC	61	481,200	Coverage of Hurricane Hugo	1991	90.0%
KOLD-TV		Tucson	71	391,930	Exploding Patrol Cars?	2002	92.0%
KXLY-TV		Spokane, WA	77	370,060	Public Funds, Private Profit	2001	94.0%
KREM-TV		Spokane	77	370,060	Wenatchee Child Sex Ring	1997	96.0%
WMTW-TV		Auburn, ME	79	362,660	Christian Civic League	2000	98.0%
KWWL-TV		Cedar Rapids, IA	89	307,310	Cloud of Concern	1992	100.0%

Source Data: FCC Study Appendix C (www.jrn.columbia.edu)

* Broadcast & Cable Yearbook 2001 (B-246-249)

Ironically, network-owned stations *under-performed* other independently-owned stations in the top 10 markets. Network-owned stations account for 55 percent of the network and PBS stations in the top 10 markets, and 70 percent if you exclude PBS. (See Appendix B). Focusing on network stations, the O&O stations under-performed affiliates, as shown below.

Table 5: Top 10 Markets⁸

	Percentage of Network Stations	Percentage of Awards to Network Stations
O&O	70 %	54 %
Affiliates	30 %	46 %

In short, network-owned stations in the top 10 markets (where a near-majority of the Dupont awards were given) were significantly *less* likely to win Dupont awards than other broadcasting stations in those same markets.

IV. CONCLUSION

This analysis explains the methodological mistakes with the study. NASA disagrees with the authors' suggestion that network-owned stations air more and higher quality local news programming. Networks own a disproportionate number of stations in the top markets. Therefore, the failure to hold constant the size of the market renders all comparisons in this study unreliable.

Moreover, the FCC should place no reliance on conclusions drawn by any study that assumed that stations in regional markets like Cedar Rapids, Iowa, compete on an equal basis for news awards with stations in New York, Los Angeles, and Chicago. With smaller budgets, these stations produce news targeted for viewers in their locality, not for the judges of these kinds of awards. The fact that these affiliate stations win fewer Dupont or Murrow awards provides no plausible basis to conclude that the viewers in these localities would be better served by broadcasting stations owned by networks.

⁸ This table includes only ABC, CBS, NBC, and Fox affiliate and O&O stations. The authors of the FCC study had intended to exclude awards to all radio and PBS stations. Unfortunately, the authors inadvertently included Dupont awards to three radio stations, KCBS-AM, WBAI/Pacifica, and WMAL-AM, a TBS station, and numerous public broadcasting stations, such as KCET-TV, and KQED-TV. In fact, the erroneously included awards appear to account for 24 percent of the data points used by the study to calculate the index. If, however, one reproduced the authors' analysis, but focused only on the top markets, the O&O stations would still under-perform the independently-owned affiliate stations.

Appendix A

Mkt rank	Market	Calls	Affil	O&O	Ownership	5:30 pm rtg	5:30 pm sh	6 pm rtg	6 pm sh	Local News Hours	Public Affairs Hours
5	SF	KGO	ABC	1	ABC Inc.	7	15	8	16	20	0.5
5	SF	KRON	NBC	1	NBC/GE	7	15	6	12	24	2.5
5	SF	KPIX	CBS	1	CBS	4	8	5	10	17	
6	Boston	WCVB	ABC	0	Hearst-Argyle	9	18	8	15	20	1
6	Boston	WHDH	NBC	0	Sunbeam TV	8	15	8	15	25	
6	Boston	WBZ	CBS	1	CBS	4	9	6	11	21	
7	Dallas	WFAA	ABC	0	Belo Corp	10	18	11	19	29	0.5
7	Dallas	KXAS	NBC	1	NBC/GE	9	16	9	15	22.5	0.5
7	Dallas	KTVT	CBS	1	CBS	3	6	3	5	21.5	
8	DC	WRC	NBC	1	NBC/GE	7	15	9	18	28	0.5
8	DC	WJLA	ABC	0	Allbritton	5	10	5	11	16.5	0.5
8	DC	WUSA	CBS	0	Gannett	4	8	5	10	20	0.5
10	Detroit	WDIV	NBC	0	Post-Newsweek	10	19	11	20	21.5	
10	Detroit	WXYZ	ABC	0	Scripps Howard	9	18	9	17	23.5	
10	Detroit	WWJ	CBS	1	CBS	2	4	2	4	20	
11	Houston	KTRK	ABC	1	ABC Inc.	9	15	9	15	27.5	
11	Houston	KHOU	CBS	0	Belo Corp	9	16	11	17	22.5	
11	Houston	KPRC	NBC	0	Post-Newsweek	7	13	7	12	29	0.5
13	Minneapolis	WCCO	CBS	1	CBS	11	22	12	22	18	
13	Minneapolis	KARE	NBC	0	Gannett	9	17	9	15	15	
13	Minneapolis	KSTP	ABC	0	Hubbard	6	12	7	12	18	1
15	Miami-F.L.	WPLG	ABC	0	Post-Newsweek	5	10	6	11	20	
15	Miami-F.L.	WTVJ	NBC	1	NBC/GE	4	8	6	10	26.5	
15	Miami-F.L.	WFOR	CBS	1	CBS	4	7	4	7	18.5	1
18	Denver	KMGH	ABC	0	McGraw Hill	6	11	5	9	26.5	1
18	Denver	KCNC	CBS	1	CBS	7	14	8	15	23	
18	Denver	KUSA	NBC	0	Gannett	9	17	8	14	29.5	0.5
21	Pittsburgh	WTAE	ABC	0	Hearst-Argyle	9	17	9	16	27	
21	Pittsburgh	KDKA	CBS	1	CBS	10	18	1	20	22	0.5
21	Pittsburgh	WPXI	NBC	0	Cox	10	18	10	17	22.5	0.5
24	Baltimore	WMAR	ABC	0	Scripps Howard	3	6	3	5	16	
24	Baltimore	WJZ	CBS	1	CBS	7	15	8	15	28.5	
24	Baltimore	WBAL	NBC	0	Hearst-Argyle	9	18	9	17	26	1.5
29	Raleigh-Durham	WTVD	ABC	1	ABC Inc.	9	16	10	17	20.5	
29	Raleigh-Durham	WRAL	CBS	0	Capitol Broadcasting	12	23	14	24	20.5	

Appendix A

Mkt rank	Market	Calls	Affil	O&O	Ownership	5:30 pm rtg	5:30 pm sh	6 pm rtg	6 pm sh	Local News Hours	Public Affairs Hours
29	Raleigh-Durham	WNCN	NBC	1	NBC/GE			2	4	23	
34	Columbus, OH	WSYX	ABC	0	Sinclair			5	9	16.5	
34	Columbus, OH	WBNS	CBS	0	Dispatch Printing Co.	10	20	11	21	28	
34	Columbus, OH	WCMH	NBC	1	NBC/GE	9	17	10	19	25.5	
35	Salt Lake City	KTVX	ABC	0	News Corp.	8	16	7	13	14.5	0.5
35	Salt Lake City	KUTV	CBS	1	CBS	6	11	6	11	15	0.5
35	Salt Lake City	KSL	NBC	0	Bonneville Intl Corp.	9	19	10	19	24.5	
39	Birmingham	WBMA	ABC	0		10	15	9	13	17	
39	Birmingham	WAT	CBS	0	Media General	5	7			6	
39	Birmingham	WVTM	NBC	1	NBC/GE	9	14	8	12	21.5	
49	Providence	WLNE	ABC	0	Freedom Comm			4	7	14	
49	Providence	WPRI	CBS	0	STC Broadcasting	3	7	5	9	19	
49	Providence	WJAR	NBC	1	NBC/GE	12	23	15	27	23.5	
54	Austin	KVUE	ABC	0	Belo Corp	10	25	9	20	17	0.5
54	Austin	KEYE	CBS	1	CBS	5	12	4	10	17	
54	Austin	KXAN	NBC	0	LIN Television Corp.	7	17	8	17	11.5	
55	Fresno	KFSN	ABC	1	ABC Inc.	12	25	13	24	16.5	
55	Fresno	KGPE	CBS	0	Ackerley Group	3	6	3	5	16	
55	Fresno	KSEE	NBC	0	Granite Broadcasting	7	15	8	17	19.5	
64	Flint	WJRT	ABC	1	ABC Inc.	9	24	14	29	21	1
64	Flint	WNEM	CBS	0	Meredith	5	15	12	24	18.5	0.5
64	Flint	WEYI	NBC	0	STC Broadcasting			2	4	12	1.5
68	Toledo	WTVG	ABC	1	ABC Inc.	6	15	10	21	20	
68	Toledo	WTOL	CBS	0	Liberty Corp.	10	28	16	34	21	1
68	Toledo	WNWO	NBC	0	Raycom Media	3	7	3	7	14.5	
69	Green Bay	WBAY	ABC	0	Young Broadcasting Inc.	10	23	12	26	17	
69	Green Bay	WFRV	CBS	1	CBS	10	22	11	22	16.5	
69	Green Bay	WGBA	NBC	0	Aries Telecomm	3	7	2	5	16.5	

Source: NSI Nov 2000

Source: BIA Associates, BIA
Master Access Data base
(March 2002)

Appendix B

Network-Owned Stations in Top 10 Markets

Station Name	Network	Ownership	Market
WABC	ABC	ABC	New York
WCBS-TV	CBS	CBS	New York
WNBC	NBC	NBC	New York
WNWY	Fox	Fox Television Stations	New York
WNYE-TV	PBS	Board of Education of NYC	New York
KABC-TV	ABC	ABC	Los Angeles
KCBS-TV	CBS	CBS	Los Angeles
KNBC	NBC	NBC	Los Angeles
KTTV	Fox	Fox Television Stations	Los Angeles
KLCS	PBS	LA Unified School Dist.	Los Angeles
WLS-TV	ABC	ABC	Chicago
WBBM-TV	CBS	CBS	Chicago
WMAQ-TV	NBC	NBC	Chicago
WFLD	Fox	Fox Television Stations	Chicago
WYCC	PBS	College Dist. #508, Cook Co.	Chicago
WPVI-TV	ABC	ABC	Philadelphia
KYW-TV	CBS	CBS	Philadelphia
WCAU	NBC	NBC	Philadelphia
WTXF-TV	Fox	Fox Television Stations	Philadelphia
WYBE	PBS	Independence Public Media	Philadelphia
KGO-TV	ABC	ABC	San Francisco-Oakland-San Jose
KPIX-TV	CBS	CBS	San Francisco-Oakland-San Jose
KRON-TV	NBC	Young Broadcasting	San Francisco-Oakland-San Jose
KTVU	Fox	Cox Enterprises	San Francisco-Oakland-San Jose
KQED	PBS	KQED Inc.	San Francisco-Oakland-San Jose
WCVB-TV	ABC	Hearst-Argyle	Boston
WBZ-TV	CBS	CBS	Boston
WHDH-TV	NBC	Sunbeam Television	Boston
WFXT	Fox	Fox Television Stations	Boston
WGBX-TV	PBS	WGBH Educational Foundation	Boston
WFAA-TV	ABC	Belo Corp.	Dallas-Fort Worth
KTVT	CBS	CBS	Dallas-Fort Worth
KXAS-TV	NBC	NBC	Dallas-Fort Worth
KDFW	Fox	Fox Television Stations	Dallas-Fort Worth
KERA-TV	PBS	North Texas Public Broadcasting	Dallas-Fort Worth
WJLA-TV	ABC	Allbritton Communications	Washington, DC
WUSA	CBS	Gannett Broadcasting	Washington, DC
WRC-TV	NBC	NBC	Washington, DC
WTTG	Fox	Fox Television Stations	Washington, DC
WETA-TV	PBS	Greater Washington Educational	Washington, DC
WXYZ-TV	ABC	Scripps Howard	Detroit
WWJ-TV	CBS	CBS	Detroit
WDIV	NBC	Post-Newsweek Stations	Detroit
WJBK	Fox	Fox Television Stations	Detroit
WTVS	PBS	Detroit Educational Television	Detroit
WSB-TV	ABC	Cox Broadcasting	Atlanta
WGCL-TV	CBS	Meredith Broadcasting	Atlanta
WXIA-TV	NBC	Gannett Broadcasting	Atlanta
WAGA	Fox	Fox Television Stations	Atlanta
WPBA	PBS	Board of Education of Atlanta	Atlanta

Percentage of Network O&Os = 56%

Percentage of Network O&Os (excluding PBS)= 70%

Source: Broadcast & Cable Yearbook 2001